1		
2		
3		
4		
5		
6		
7		
8	UNITED STATES	DISTRICT COURT
9	SOUTHERN DISTRI	ICT OF CALIFORNIA
10		
11	MULTIMEDIA PATENT TRUST,	CASE NO. 09-CV-278 H (CAB)
12	Plaintiff, vs.	TENTATIVE CLAIM CONSTRUCTION ORDER FOR
13		UNITED STATES PATENT NUMBER 5,227,878, PATENT
14	DIRECTV, Inc., et al.,	NUMBER 5,136,377, PATENT NUMBER 5,500,678, AND
15	Defendants.	PATENT NUMBER 4,958,226
10 17	On August 2, 2011, Plaintiff Multimedi	a Patent Trust and Defendants DirecTV, Inc. and
17	Vizio, Inc. submitted their opening claim con	struction briefs. (Doc. Nos. 414-16.) After due
10	consideration of the parties' briefing, the	Court issues the following tentative claim
20	construction order.	
20	Claim Construction	on – Legal Standard
22	The "bedrock principle" of patent la	aw is that the "claims of a patent define the
23	invention." Phillips v. AWH Corp., 415 F.3d	1303, 1312 (Fed. Cir. 2005). In construing claim
24	terms, a court must determine the meaning of	any disputed words from the perspective of one
25	of ordinary skill in the pertinent art at the tim	e of filing. <u>Phillips</u> , 415 F.3d at 1313.
26	The baseline for the analysis in claim	n construction is the "ordinary and customary
27	meaning" of the claim term. Phillips, 415 l	F.3d at 1312-13. However, the "ordinary and
28	customary meaning" phrase itself has a speci	alized meaning in patent law. It is the meaning

- 1 -

that the term would have to a person of ordinary skill in the art at the time of the invention. 1 2 Id. at 1313. That person having ordinary skill in the art is deemed "to read the claim term not 3 only in the context of the particular claim in which the disputed term appears, but in the context of the entire patent, including the specification." Id. If the meaning of a term is not 4 5 readily apparent, the court must then look to other intrinsic evidence to define the term. See id. at 1314. 6

7 A court must read claims "in view of the specification, of which they are a part." 8 Markman v. Westview Instruments, Inc., 52 F.3d 967, 979 (Fed. Cir. 1995). A court may also 9 look beyond the patent and consult the prosecution history, if in evidence, during claim 10 construction. Phillips, 415 F.3d at 1317. The patent and its prosecution history "usually 11 provides the technological and temporal context to enable the court to ascertain the meaning 12 of the claim to one of ordinary skill in the art at the time of the invention." V-Formation, Inc. 13 v. Benetton Group SpA, 401 F.3d 1307, 1310 (Fed. Cir. 2005). In addition to intrinsic 14 evidence, a court may also consider pertinent extrinsic evidence. Phillips, 415 F.3d at 1317. 15 The analysis for a means-plus-function claim term is governed by 35 U.S.C. § 112, ¶ 6:

- 16
- 17 18

An element in a claim for a combination may be expressed as a means or step for performing a specified function without the recital of structure, material, or acts in support thereof, and such claim shall be construed to cover the corresponding structure, material, or acts described in the specification and equivalents thereof.

19 For a means-plus-function term, the analysis consists of two distinct steps. JVW 20 Enters., Inc. v. Interact Accessories, Inc., 424 F.3d 1324, 1330 (Fed. Cir. 2005). First, the 21 Court must identify the function associated with the claim language. Id. Second, then the 22 Court must identify the corresponding structure in the written description that performs the 23 function. Id. A "structure disclosed in the specification is [a] 'corresponding' structure only 24 if the specification or prosecution history clearly links or associates that structure to the 25 function recited in the claim." <u>B. Braun Medical, Inc. v. Abbott Labs.</u>, 124 F.3d 1419, 1424 26 (Fed. Cir. 1997). A proper construction should account for "all structures in the specification 27 corresponding to the claimed function" and it would be error to limit the structure to be just 28 the preferred embodiment. Callicrate v. Wadsworth Mfg., Inc., 427 F.3d 1361, 1369 (Fed. Cir.

2005). "The corresponding structure to a function set forth in a means-plus-function limitation
 must actually perform the recited function, not merely enable the pertinent structure to operate
 as intended." <u>Asyst Technologies, Inc. v. Empak, Inc.</u>, 268 F.3d 1364, 1371 (Fed. Cir. 2001).

4 Means-plus-function terms are terms which are "purely functional limitations that do 5 not provide the structure that performs the recited function" and should be construed as under 6 35 U.S.C. § 112, ¶ 6. Depuy Spine, Inc. v. Medtronic Sofamor Sanek, Inc., 469 F.3d 1005, 7 1023 (Fed. Cir. 2006). "Use of the term 'means' in a patent claim limitation creates a 8 presumption that the statutory means-plus-function provision has been invoked, but that 9 presumption may be rebutted if the properly construed claim limitation itself recites 10 sufficiently definite structure to perform the claimed function." Kemco Sales, Inc. v. Control 11 Papers Co., Inc., 208 F.3d 1352, 1361 (Fed. Cir. 2000).

The Court reviews each claim and considered each construction in light of the
applicable standards of law. The Court construes the claim terms in dispute as indicated in the
boxes in the charts below.

IT IS SO ORDERED.

16 DATED: August 15, 2011

15

17

18

19

20

21

22

23

24

25

26

27

28

MARILYN L. HUFF, District Judge UNITED STATES DISTRICT COURT

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
2. A circuit for		consistent with claims	consistent with claims		consistent with claims
encoding applied		2, 4, 6, and 12	2, 4, 6, and 12		2, 4, 6, and 12
video signals that		G	0		e
comprise successive		frame:	frame:		frame:
frames, where each		a complete set of	a complete nicture		a complete set of
blocks comprising:		digital representations	from a video sequence		digital representations
blocks, comprising.		for an image	from a video sequence		for an image
	consistent with claims	consistent with claims	consistent with claims	any path that can	consistent with claims
	2-8, 11 and 12	2-8, 11 and 12	2-8, 11 and 12	carry electrical current	2-8, 11 and 12
	circuit:	circuit:	circuit:		circuit:
			MPT is collaterally		
	any path that can		estopped from		any path that can
	carry electrical current	Plaintiff agrees with	relitigating this term.		carry electrical current
		this construction.			
		However, plaintiff	any path that can		
		disputes that it is	carry electrical current		
	successive fromes.	successive frames:	successive frames	one frame following	successive frames.
	successive mannes.	successive maines.	MPT is collaterally	another: consecutive	successive mannes.
	one frame following	one frame following	estopped from	frames	one frame following
	another: consecutive	another: consecutive	relitigating this term.		another: consecutive
	frames	frames			frames
			one frame following		
		However, plaintiff	another; consecutive		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		disputes that it is	frames		
	consistent with claims	consistent with claims	consistent with claims	sets of pixels (picture	consistent with claims
	2, 5 and 12	2, 5 and 12	2, 5 and 12	elements also called pels) that constitute a	2, 5 and 12
	blocks:	blocks:	blocks: <i>MPT is collaterally</i>	portion of a frame	blocks:
	sets of pixels (picture elements also called	sets of pixels (picture elements also called	estopped from relitigating this term		sets of pixels (picture elements also called
	pels) that constitute a portion of a frame	pels) that constitute a portion of a frame	sets of pixels (picture		pels) that constitute a portion of a frame
		However, plaintiff disputes that it is	pels) that constitute a		
		collaterally estopped.			
means for encoding		Function: encoding	Function: encoding		Function: encoding
the blocks of some		the blocks of some of	the blocks of some of		the blocks of some of
of said frames by		said	said frames by		said
developing for		frames by developing	developing for each		frames by developing
each block of such		for each block of such	block of such frames		for each block of such
frames (a) an		frames (a) an	(a) an approximated		frames (a) an
approximated		approximated version	version of said block		approximated version
version of said		of said block derived	derived from an		of said block derived
block derived		from an approximated	approximated version		from an approximated
irom an		version of said block	of sald block		version of said block
approximated		neveloped for a	neveloped for a		neveloped for a
version of said		previous frame, and	previous frame, and		previous frame, and

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
block developed		(b) a code which	(b) a code which		(b) a code which
for a previous		represents the	represents the		represents the
frame, and (b) a		deviation of said	deviation of said		deviation of said
code which		block from said	block from said		block from said
represents the		approximated version	approximated version		approximated version
deviation of said		of said block	of said block		of said block
block from said					
approximated		Structure: shift circuit	Structure: subtractor		Structure: shift circuit
version of said		15, subtractor 20,	20, DCT 30, quantizer		15, subtractor 20,
block		DCT 30, quantizer 40,	40, coder 50, inverse		DCT 30, quantizer 40,
		inverse DCT 41, and	DCT 41, adder 42,		inverse DCT 41, and
		adder 42 (as shown in	frame memory 12,		adder 42 (as shown in
		Figure 1 and	motion estimator 11,		Figure 1 and
		described in col. 1:56-	shift circuit 15 (as		described in col. 1:56-
		58, col. 3:64-col.	shown in Fig. 1 and as		58, col. 3:64-col.
		4:32)	described at col. 3,		4:32)
			line 64 - col. 4, line		
			32) including frame		[<u>See</u> MPT's CC brief,
			Fi+1 input to		Doc. No. 414, at 32.]
			subtractor 20 and		
			motion estimator 11,		
			the prediction block of		
			pels signal input to		
			subtractor 20, the		
			buffer feedback signal		
			input to quantizer 40,		
			the coded prediction		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			error output by coder		
			50, and including all		
			inputs, outputs, and		
			interconnections		
			between these		
			elements		
	consistent with claims	consistent with claims	consistent with claims	differences	consistent with claims
	2 and 12	2 and 12	2 and 12		2 and 12
	1 • <i>4</i>	.	.		1 • <i>4</i>
	deviations:	deviations:	<i>MPT is collaterally</i>		deviations:
	differences	differences	estopped from		differences
			relitigating this term.		
		However, plaintiff			
		disputes that it is	differences		
		collaterally estopped.			
second means for		Function:	Function:		Function:
approximating		approximating the	approximating the		approximating the
the blocks of those		blocks of those of said	blocks of those of said		blocks of those of said
of said frames		frames that are to be	frames that are to be		frames that are to be
that are to be		interpolated by	interpolated by		interpolated by
interpolated by		combining	combining		combining
combining		approximated versions	approximated versions		approximated versions
approximated		of said blocks in	of said blocks in		of said blocks in
versions of said		selected ones of the	selected ones of the		selected ones of the
blocks in selected		frames that are	frames that are		frames that are
ones of the frames		encoded in said means	encoded in said means		encoded in said means

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
that are encoded		for encoding	for encoding		for encoding
in said means for					
encoding		Structure: shift circuit	Structure: frame		Structure: shift circuit
		13, shift circuit 14,	memory 12, shift		13, shift circuit 14,
		and averager 17 (as	circuits 13 and 14, and		and averager 17 (as
		shown in Figure 1 and	averager 17 (as shown		shown in Figure 1 and
		described at col. 4:35-	in Fig. 1 and as		described at col. 4:35-
		49 and col. 5:35-47	described at col. 3,		49 and col. $5:35-47$
			lines $0.3-07$ and $col. 4$,		[See MDT's CC brief
			the coded version of		15ee MFT SCC Drief, Doc No 414 at 321
			frame Fi-1 output by		<i>Doc. No. 414</i> , <i>at 52</i> .]
			frame memory 12, the		
			motion vector signal		
			and coded versions of		
			frames Fi-1 and Fi+1		
			input to shift circuits		
			13 and 14, and the		
			final prediction of		
			frame Fi output by		
			averager 17, and		
			including all inputs,		
			outputs, and		
			interconnections		
			between these		
			elements		
third means		Function: developing	Function: developing		Function: developing

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
responsive to said		code that corresponds	code that corresponds		code that corresponds
second means and		to those pels in blocks	to those pels in blocks		to those pels in blocks
to said frames to		approximated by the	approximated by said		approximated by the
be interpolated		second means that	second means that		second means that
for developing		differ from	differ from		differ from
code that		corresponding pels in	corresponding pels in		corresponding pels in
corresponds to		frames to be	said frames to be		frames to be
those pels in		interpolated by greater	interpolated by greater		interpolated by greater
blocks		than a preselected	than a preselected		than a preselected
approximated by		threshold	threshold		threshold
said second means					
that differ from		Structure: subtractor	Structure: frame		Structure: subtractor
corresponding		43, DCT 18, quantizer	memory 16, subtractor		43, DCT 18, quantizer
pels in said		19, and coder 44 (as	43, DCT 18, quantizer		19, and coder 44 (as
frames to be		shown in Figure 1 and	19, and coder 44 (as		shown in Figure 1 and
interpolated by		described at col. 1:56-	shown in Fig. 1 and as		described at col. 1:56-
greater than a		58, col 3:19-25, and	described at col. 4,		58, col 3:19-25, and
preselected		col. 4:51-62)	lines 51-62) including		col. 4:51-62)
threshold			the actual frame Fi		
			input to and output by		[<u>See</u> MPT's CC brief,
			frame memory 16, the		Doc. No. 414, at 32.
			actual frame Fi and		Defendants
			the predicted frame Fi		improperly include
			input to subtractor 43,		frame memory 16.]
			the buffer feedback		
			signal input to		
			quantizer 19, the		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			coded interpolation		
			error signal output by		
			coder 44, and		
			including all inputs,		
			outputs, and		
			interconnections		
			between these		
	• • •	• • •	elements		• • •
	approximated:	approximated:	approximated:		approximated:
	predicted	predicted	predicted		predicted
	preselected	preselected	preselected		preselected
	threshold:	threshold:	threshold:		threshold:
	a value chosen in	a value chosen in	a value chosen in		a value chosen in
	advance	advance	advance		advance
3. The circuit of claim	consistent with claims	consistent with claims	consistent with claims	any path that can	consistent with claims
2 wherein said code	2-8, 11 and 12	2-8, 11 and 12	2-8, 11 and 12	carry electrical current	2-8, 11 and 12
developed for a pel by					
said third means	circuit:	circuit:	circuit:		circuit:
represents the			MPT is collaterally		
difference between	any path that can	any path that can	estopped from		any path that can
the value of said pel	carry electrical current	carry electrical current	relitigating this term.		carry electrical current
and the value of said		However, plaintiff			
pel approximated by		disputes that it is	any path that can		
said second means		collaterally estopped.	carry electrical current		
	approximated:	approximated:	approximated:		approximated:

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
	predicted	predicted	predicted		predicted
4. The circuit of claim	consistent with claims	consistent with claims	consistent with claims	any path that can	consistent with claims
2 wherein the frames	2-8, 11 and 12	2-8, 11 and 12	2-8, 11 and 12	carry electrical current	2-8, 11 and 12
selected for					
combining in said	circuit:	circuit:	circuit:		circuit:
second means include			MPT is collaterally		
a frame encoded in	any path that can	Plaintiff agrees with	estopped from		any path that can
said first means that	carry electrical current	this construction.	relitigating this term.		carry electrical current
precedes the frame		However, plaintiff			
approximated in said		disputes that it is	any path that can		
second means and a		collaterally estopped.	carry electrical current		
frame encoded in said					
first means that					
succeeds the frame					
approximated in said					
means.					
	approximated:	approximated:	approximated:		approximated:
	predicted	predicted	predicted		predicted
		consistent with claims	consistent with claims		consistent with claims
		2, 4, 6, and 12	2, 4, 6, and 12		2, 4, 6, and 12
		frame:	frame:		frame:
		a complete set of	a complete picture		a complete set of
		digital representations	from a video sequence		digital representations
		for an image			for an image

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
5. The circuit of claim 4 wherein said combining includes developing anticipated versions of said blocks		anticipated versions: The referenced language is not indefinite.	anticipated versions: (indefinite)		anticipated versions: estimated or expected versions
		The Court should construe the term as "estimated versions."			
		anticipated: estimated	The proper term for construction, as construed in Defendants' preliminary constructions, is: "anticipated versions"		anticipated: estimated or expected
	consistent with claims 2-8, 11 and 12	consistent with claims 2-8, 11 and 12	consistent with claims 2-8, 11 and 12	any path that can carry electrical current	consistent with claims 2-8, 11 and 12
	any path that can carry electrical current	any path that can carry electrical current However, plaintiff disputes that it is	<i>MPT is collaterally</i> <i>estopped from</i> <i>relitigating this term.</i> any path that can carry electrical current		any path that can carry electrical current

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		collaterally estopped.			
	<i>consistent with claims</i> 2, 5 and 12	<i>consistent with claims</i> 2, 5 and 12	<i>consistent with claims</i> 2, 5 and 12	sets of pixels (picture elements also called pels) that constitute a	<i>consistent with claims</i> 2, 5 and 12
	blocks:	blocks:	blocks: <i>MPT is collaterally</i>	portion of a frame	blocks:
	sets of pixels (picture elements also called pels) that constitute a	sets of pixels (picture elements also called pels) that constitute a	estopped from relitigating this term.		sets of pixels (picture elements also called pels) that constitute a
	portion of a frame	portion of a frame	sets of pixels (picture elements also called		portion of a frame
		disputes that it is collaterally estopped.	portion of a frame		
6. The circuit of claim 2 wherein a set proportion of frames	<i>consistent with claims</i> 2-8, 11 and 12	<i>consistent with claims</i> 2-8, 11 and 12	<i>consistent with claims</i> 2-8, 11 and 12	any path that can carry electrical current	<i>consistent with claims</i> 2-8, 11 and 12
of said applied video signals are	circuit:	circuit:	circuit: <i>MPT is collaterally</i>		circuit:
interpolated.	any path that can carry electrical current	any path that can carry electrical current	estopped from relitigating this term.		any path that can carry electrical current
		However, plaintiff disputes that it is collaterally estopped.	any path that can carry electrical current		
		<i>consistent with claims</i> 2, 4, 6, and 12	<i>consistent with claims</i> 2, 4, 6, and 12		<i>consistent with claims 2, 4, 6, and 12</i>

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		frame: a complete set of digital representations	frame: a complete picture from a video sequence		frame: a complete set of digital representations
		for an image	from a video sequence		for an image
7. The circuit of claim 6 wherein said proportion is approximately one half.		This term should be given its plain meaning to one of skill in the art, and therefore does not require construction. If the Court determines that this term requires construction, the Court should construe the term as "nearly one-half."	almost exactly one- half		approximately one half: This term should be given its plain meaning to one of skill in the art, and therefore does not require construction.
	<i>consistent with claims</i> 2-8, 11 and 12	<i>consistent with claims</i> 2-8, 11 and 12	<i>consistent with claims</i> 2-8, 11 and 12	any path that can carry electrical current	<i>consistent with claims</i> 2-8, 11 and 12
	circuit: any path that can	circuit: any path that can	circuit: <i>MPT is collaterally</i> <i>estopped from</i>		circuit: any path that can
	carry electrical current	carry	relitigating this term.		carry electrical current

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
8. The circuit of claim		buffer means:	buffer means:		buffer means:
2 fruther [sic]					
comprising buffer		This term does not	Function: buffering		Function: buffering
means for interposed		require construction			
between the codes		under 35 U.S.C. §	<u>Structure</u> : buffer 60		<u>Structure</u> : buffer 60
developed by said		112(6).	(as shown in Fig. 1		(as shown in Fig. 1
means for encoding			and as described at		and as described at
and said third means		If the Court	col. 4, lines 16-18 and 144		col. 4, lines 16-18 and 1.4 1.4 1.5 1.6 1.6
and an output port		determines that this	col. 4, lines 59-62)		col. 4, lines 59-62)
of said circuit.		term is governed by	including the		including the
		35 U.S.C. 9 112(0),	quantized output		quantized output
		the Court should	coefficients and coded		coefficients and coded
		follows:	interpolation error		interpolation error
		Ionows.	from this element and		from this element and
		Function: To hold	the feedback signals		the feedback signals
		data (e.g. coded	output by this element		output by this element
		values or	output by this element		output by this element
		coded interpolation			
		error) awaiting			
		transmission			
		transmission.			
		Structure: buffer 60			
		(as shown in Figure 1			
		and described in col.			
		4:16-18, 59-60)			
		interposed between	interposed between		interposed between

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		the codes developed by said means for encoding and said third means and an output port of said circuit:	the codes developed by said means for encoding and said third means and an output port of said circuit:		the codes developed by said means for encoding and said third means and an output port of said circuit:
		The referenced language is not indefinite. This term should be given its plain meaning to one of skill in the art, and therefore does not require construction.	(indefinite)		This term should be given its plain meaning to one of skill in the art, and therefore does not require construction.
	<i>consistent with claims</i> 2-8, 11 and 12	<i>consistent with claims</i> 2-8, 11 and 12	<i>consistent with claims</i> 2-8, 11 and 12	any path that can carry electrical current	<i>consistent with claims</i> 2-8, 11 and 12
	circuit:	circuit:	circuit: <i>MPT is collaterally</i>		circuit:
	any path that can carry electrical current	any path that can carry electrical current	estopped from relitigating this term.		any path that can carry electrical current
		However, plaintiff	any path that can		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			carry electrical current		
11. The circuit of claim 7 wherein granularity of the	granularity:	granularity:	granularity:		granularity:
codes generated by said first means and said third means is controlled by the occupancy level of said buffer.	coarseness	coarseness	coarseness		coarseness
	<i>consistent with claims</i> 2-8, 11 and 12	<i>consistent with claims</i> 2-8, 11 and 12	consistent with claims 2-8, 11 and 12	any path that can carry electrical current	<i>consistent with claims</i> 2-8, 11 and 12
	circuit:	circuit: any path that can	circuit: <i>MPT is collaterally</i>		circuit:
	any path that can carry electrical current	carry electrical current However, plaintiff disputes that it is collaterally estopped	<i>estopped from</i> <i>relitigating this term.</i> any path that can carry electrical current		any path that can carry electrical current
12. A circuit	consistent with claims	consistent with claims	consistent with claims	any path that can	consistent with claims
responsive to coded video signals where	2-8, 11 and 12	2-8, 11 and 12	2-8, 11 and 12	carry electrical current	2-8, 11 and 12
the video signals	circuit:	circuit:	circuit:		circuit:
comprise successive		any path that can	MPT is collaterally		
frames and each	any path that can	carry electrical current	estopped from		any path that can
frame includes a	carry electrical current		relitigating this term.		carry electrical current

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
plurality of blocks and		However, plaintiff	any path that can		
where the coded video		disputes that it is	carry electrical current		
signals comprise		collaterally estopped			
codes that describe					
deviations from					
approximated blocks					
and codes that					
describe deviations					
from interpolated					
blocks, comprising;				1 6 6	
	coded:	codea:		change from one form	coaea:
	1 6 6		MPT is collaterally	of representation	1 6 6
	change from one form	change from one form	estopped from	to another	change from one form
	of representation to	of representation to	relitigating this term.		of representation to
	another	another	1 6 6		another
			change from one form		
		However, plaintiff	of representation to		
		disputes that it is	another		
	• • •	collaterally estopped.	• • •	1	• • •
	approximated	approximated	approximated	predicted blocks	approximated
	DIOCKS:	DIOCKS:	DIOCKS:		DIOCKS:
			MP1 is collaterally		
	predicted blocks	predicted blocks	estopped from		predicted blocks
			relitigating this term.		
		However, plaintiff			
		disputes that it is	predicted blocks		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		collaterally estopped.			
	consistent with claims	consistent with claims	consistent with claims	sets of pixels (picture	consistent with claims
	2, 5 and 12	2, 5 and 12	2, 5 and 12	elements also called	2, 5 and 12
				pels) that constitute a	
	blocks:	blocks:	blocks:	portion of a frame	blocks:
			MPT is collaterally		
	sets of pixels (picture	sets of pixels (picture	estopped from		sets of pixels (picture
	elements also called	elements also called	relitigating this term.		elements also called
	portion of a frame	portion of a frame			portion of a frame
	portion of a frame	portion of a mane	sets of pixels (picture		portion of a frame
		However, plaintiff	pole) that constitute a		
		disputes that it is	pers) that constitute a		
		collaterally estopped.	portion of a frame		
		consistent with claims	consistent with claims		consistent with claims
		2, 4, 6, and 12	2, 4, 6, and 12		2, 4, 6, and 12
		6	6		6
		Irame:	Irame:		Irame:
		a complete set of	a complete picture		a complete set of
		digital representations	from a video sequence		digital representations
		for an image			for an image
	consistent with claims	consistent with claims	consistent with claims	differences	consistent with claims
	2 and 12	2 and 12	2 and 12		2 and 12
	deviations:	deviations:	deviations:		deviations:
			MPT is collaterally		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
	differences	differences	estopped from		differences
			relitigating this term.		
		However, plaintiff			
		disputes that it is	differences		
		collaterally estopped.			
means for		Plaintiff disputes that	MPT is collaterally	Function:	Function:
developing block		it is collaterally	estopped from	The function is	The function is
approximations from		estopped from	relitigating this term.	developing block	developing block
said codes that		offering a proposed		approximations [the	approximations [the
describe deviations		construction for this	<u>Function</u> : developing	combinations of	combinations of
from approximated		term.	block approximations	predicted blocks with	predicted blocks with
blocks; and			from said codes that	differences	differences
		<u>Function:</u> developing	describe deviations	between the actual	between the actual
		block approximations	from approximated	blocks and the	blocks and the
		from said codes that	blocks	predicted blocks]	predicted blocks]
		describe deviations		from said codes that	from said codes that
		from approximated	<u>Structure</u> : decoder 22,	describe deviations	describe deviations
		blocks	DCT^{-1} 24, adder 27,	from approximated	from approximated
			and shift circuit 26,	blocks.	blocks.
		Structure: decoder 22,	including all inputs		
		inverse DCT 24,	and outputs of these	<u>Corresponding</u>	Corresponding
		adder 27, and shift	elements related to the	Structure:	Structure:
		circuit 26 (as shown	claimed function (See	Decoder 22, DCT	Decoder 22, DCT
		in Fig. 2 and as	Fig. 2; Col. 4, lines 3-	24, Adder 27, and	24, Adder 27, and
		described at col. 1:56-	10, 26-32, Col. 4, line	Shift Circuit 26,	Shift Circuit 26,
		58, col. 4:3-10, 26-32,	63 to Col. 5, line 7).	including all inputs	including all inputs
		col. 4:63-col. 5:7)		and outputs of these	and outputs of these

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
				elements related to the	elements related to the
				claimed	claimed
				function (See Fig. 2;	function (See Fig. 2;
				Col. 4, lines $3-10, 26-$	Col. 4, lines $3-10, 26-$
				52, Col. 4, line 05 to	52, Col. 4, line 05 to
	consistent with claims	consistent with claims	consistent with claims	differences	consistent with claims
	2 and 12	2 and 12	2 and 12	uniterences	2 and 12
	deviations:	deviations:	deviations:		deviations:
			MPT is collaterally		
	differences	differences	estopped from		differences
			relitigating this term.		
		However, plaintiff			
		disputes that it is	differences		
		collaterally estopped.			
	block	block	block	the combinations of	block
	approximations:	approximations:	approximations:	predicted blocks with	approximations:
			MPT is collaterally	differences	
	the combinations of		estopped from	between the actual	the combinations of
	predicted blocks with	the combinations of	relifigating this term.	blocks and the	predicted blocks with
	differences between	differences between	the combinations of	predicted blocks	differences between
	the predicted blocks and	the actual blocks and	ne combinations of		the predicted blocks and
	the predicted blocks	the predicted blocks	differences between		the predicted blocks
			the actual blocks and		
		However plaintiff	the predicted blocks		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		disputes that it is collaterally estopped			
	approximated blocks:	approximated blocks:	approximated blocks:	predicted blocks	approximated blocks:
	predicted blocks	predicted blocks However, plaintiff disputes that it is collaterally estopped.	<i>MPT is collaterally</i> <i>estopped from</i> <i>relitigating this term.</i> predicted blocks		predicted blocks
means responsive to said block approximations and to said codes that describe deviations from interpolated blocks to develop said interpolated blocks		Plaintiff disputes that it is collaterally estopped from offering a proposed construction for this term. <u>Function:</u> develop said interpolated blocks <u>Structure:</u> decoder 25, inverse DCT 34, adder 35, shift circuits 31 and 39, and averager 32 (as shown in Fig. 2 and as	MPT is collaterally estopped from relitigating this term <u>Function</u> : to develop said interpolated blocks responsive to said block approximations and to said codes that describe deviations from interpolated blocks. <u>Structure</u> : decoder 25, DCT ⁻¹ 34, adder 35, and shift circuite 21	Function: The function is to develop said interpolated blocks responsive to said block approximations [the combinations of predicted blocks with differences between the actual blocks and the predicted blocks] and to said codes that describe deviations from interpolated	Function: The function is to develop said interpolated blocks responsive to said block approximations [the combinations of predicted blocks with differences between the actual blocks and the predicted blocks] and to said codes that describe deviations from interpolated

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		described at col. 1:56-	and 39, and averager	Structure:	Structure:
		58, col. 4:63-65, col.	32, including all	Decoder 25, DCT ⁻¹	Decoder 25, DCT ⁻¹
		5:7-23, 5:35-47)	inputs and outputs of	34, Adder 35, and	34, Adder 35, and
			these elements related	Shift Circuits 31 and	Shift Circuits 31 and
			to the claimed	39, and Averager 32,	39, and Averager 32,
			function (See Fig. 2;	including all inputs	including all inputs
			Col. 4, lines $63-65$;	and outputs of these	and outputs of these
			Col. 5, filles 7-25	claimed function	claimed function
			structure and inputs	(See Fig. 2: Col. 4	(See Fig. 2: Col. 4
			that correspond to	lines 63-65: Col. 5.	lines 63-65: Col. 5.
			these elements is at	lines 7-23 [description	lines 7-23 [description
			Col. 4, lines 38-50])	of the structure and	of the structure and
			, , , , , , , , , , , , , , , , , , ,	inputs that correspond	inputs that correspond
				to these elements is at	to these elements is at
				Col. 4, lines 38-50]).	Col. 4, lines 38-50]).
	block	block	block	the combinations of	block
	approximations:	approximations:	approximations:	predicted blocks with	approximations:
				differences	
	the combinations of	the combinations of	MPT is collaterally	between the actual	the combinations of
	predicted blocks with	predicted blocks with	estopped from	blocks and the	predicted blocks with
	differences between	differences between	relitigating this term	predicted blocks	differences between
	the actual blocks and	the actual blocks and			the actual blocks and
	the predicted blocks	the predicted blocks	the combinations of		the predicted blocks
		However alsistiff	predicted blocks with		
		However, plaintiff	the estual blocks and		
		aisputes that it is	the actual blocks and		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		collaterally estopped.	the predicted blocks		
	consistent with claims 2 and 12	consistent with claims 2 and 12	consistent with claims 2 and 12	differences	consistent with claims 2 and 12
	deviations:	deviations:	deviations:		deviations:
	differences	differences	MPT is collaterally estopped from		differences
		However, plaintiff disputes that it is	relitigating this term		
		collaterally estopped.	differences		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
1. An encoder including a coder for developing encoder output signals from frame difference signals,		<i>consistent with claims</i> 1, 4, 6, 17, 26, 27, 28 <i>and</i> 29 frame:	<i>consistent with claims</i> 1, 4, 6, 17, 26, 27, 28 <i>and</i> 29 frame:		<i>consistent with claims</i> 1, 4, 6, 17, 26, 27, 28 <i>and</i> 29 frame:
		digital representations for an image	from a video sequence		digital representations for an image
		consistent with claims 1, 8 and 29	consistent with claims 1, 8 and 29	hardware, which may include a general- purpose processor	consistent with claims 1, 8 and 29
		hardware, which may include one or more circuits or processors programmed with appropriate software, that changes a video signal from one form of representation to another	hardware, which may include a general- purpose processor programmed with appropriate software, that changes a video signal from one form of representation to another	appropriate software, that changes a video signal from one form of representation to another	hardware, which may include a general- purpose processor programmed with appropriate software, that changes a video signal from one form of representation to another
prediction means responsive to said encoder output		<u>Function:</u> predicting a next frame's signals	This limitation must be construed under 35 U.S.C. § 112(6).	<u>Function</u> : predicting a next frame's signals	<u>Function</u> : predicting a next frame's signals
signals for predicting a next		Structure: inverse	Function:	<u>Structure</u> : As shown in Figure 2	<u>Structure</u> : As shown in Figure 2

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
frame's signals, and		quantizer 39; inverse	predicting a next	and as described in	and as described in
		DCT 40;	frame's signals in	those portions of	those portions of
		adder 41; and motion	response to the	5:60-7:20 describing	5:60-7:20 describing
		compensator 43 (as	encoder output signals	these elements:	these elements:
		shown in			
		Figure 2 and as	Structure:	adders 41 and 54;	adders 41 and 54;
		described at col. 6:9-	motion vector	subtracter 44;	subtracter 44;
		31, 40-46)	generator 13 (as	multiplier 45; motion	multiplier 45; motion
			shown in Fig. 1 and	compensator 43;	compensator 43;
			its internal circuitry	inverse quantizer 39;	inverse quantizer 39;
			shown in Figs. 3-4,	inverse DCT 40; and	inverse DCT 40; and
			and described at cols.	including all inputs,	including all inputs,
			4:35-47, 5:15-27, and	outputs, and	outputs, and
			7:33-10:49), including	interconnections of	interconnections of
			the applied next	these elements	these elements
			frames I(t) and I(t-1)	necessary to the	necessary to the
			input to this element	claimed function.	claimed function.
			and motion vectors		
			MV(t-1) output by		
			this element;		
			motion vector		
			selector/encoder 14		
			(as shown in Fig. 1		
			and its internal		
			circuitry shown in		
			Fig. 6, and described		
			at cols. 4:43-51, 5:23-		
			39, and 10:50-12:18),		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			including the motion vector MV(t-1) input to this element and		
			motion vectors MV(t- 2) output by this element;		
			adder 41 (as shown in Fig. 2 and described at col. 6:19-22), including all inputs and outputs;		
			adder 54 (as shown in Fig. 2 and described at col. 6:19-24), including all inputs and outputs;		
			subtractor 44 (as shown in Fig. 2 and described at cols. 5:65-6:3, 6:31-37, and 6:41-44), including all inputs and outputs;		
			multiplier 45 (as shown in Fig. 2 and described at cols.		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			5:65-6:3 and 6:35-39),		
			including leak factor		
			L(t-4) and displaced		
			frame signal DF with		
			the mean removed		
			input to this element		
			and the best		
			estimation of image		
			I(t-4) output by this		
			element;		
			motion compensator		
			43 (as shown in Fig. 2		
			and described at cols.		
			5:32-37, 6:28-33,		
			6:40-41, and 12:20-		
			32), including the		
			motion vectors MV(t-		
			4) and previous frame		
			input to this element		
			and the estimate of the		
			image signal I(t-4)		
			output by this		
			element;		
			inverse quantizer 39		
			(as shown in Fig. 2		
			and its internal		
			circuitry in Fig. 11		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			and described at cols.		
			6:9-18 and 18:36-68),		
			including scale factors		
			Sji and quantized		
			superblock vector		
			signals input to this		
			element and inversely		
			quantized frequency		
			coefficients output by		
			this element; and		
			inverse DCT 40 (as		
			shown in Fig. 2 and		
			described at cols. 6:9-		
			14), including the		
			inversely quantized		
			frequency coefficients		
			input to this element		
			and approximated		
			frame difference		
			signals output by this		
			element		
means for	Function:	Function:	This limitation must	<u>Function</u> : developing	Function:
developing said	developing the frame	developing the frame	be construed under 35	the frame difference	developing the frame
frame difference	difference signals	difference signals	U.S.C. § 112(6).	signals mentioned	difference signals
signals from applied	mentioned earlier in	mentioned earlier in		earlier in the claim	mentioned earlier in
next frame signals of	the claim from	the claim from	Function:	trom applied next	the claim from
an image frame and	applied next frame	applied next frame	developing the frame	trame signals of an	applied next frame
from output signals	signals of an image	signals of an image	difference signals	image frame and from	signals of an image

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
of said prediction means, the improvement comprising:	frame and from output signals of said prediction means	Irame and from output signals of said prediction means <u>Structure:</u> subtracter 36 (as shown in Figure 2 and described at col. 5:63- 6:4, 6:40-46)	mentioned earlier in the claim from applied next frame signals of an image frame and from output signals of said prediction means. <u>Structure:</u> subtractor 35 (as shown in Fig. 2 and described at cols. 5:63-6:3), including the image signal I(t-4) input to this element and the frame-mean signal M(t-4) input to this element and the mean excluded image signal I(t-4) output by this element; and subtractor 36 (as shown in Fig. 2 and described at cols. 5:63-6:3), including the mean excluded image signal I(t-4) input to this element	output signals of said prediction means. <u>Structure</u> : As shown in Figure 2 and described at 5:63- 6:3: subtracters 35 and 36, and all inputs, outputs, and interconnections of these elements necessary to the claimed function	rame and from output signals of said prediction means <u>Structure</u> : As shown in Figure 2 and described at 5:63- 6:3: subtracters 35 and 36, and all inputs, outputs, and interconnections of these elements necessary to the claimed function

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
BOLD) said coder including controllable quantizer means that quantizes said difference signals in accordance with a quantization schema that varies with the	<u>Function:</u> quantizing the difference signals mentioned earlier in the claim in accordance with a quantization schema that varies with the	<u>Function:</u> quantizing the difference signals mentioned earlier in the claim in accordance with a quantization schema that varies with the	CONSTRUCTIONand best estimation ofimage I(t-4) input tothis element and theframe differencesignals output by thiselementThis limitation mustbe construed under35 U.S.C. § 112(6).Function:quantizing thedifference signalsmentioned earlier in	<u>Function</u> : quantizing the difference signals mentioned earlier in the claim in accordance with a quantization schema that varies with the dictates of a	<u>Function:</u> quantizing the difference signals mentioned earlier in the claim in accordance with a quantization schema that varies
dictates of a control signal; and	that varies with the dictates of a control signal	dictates of a control signal <u>Structure:</u> (1) Quantizer vector selector 38 (as shown in Figure 2, and described at col. 5:60-6:12 (the other elements cited in this passage are not part of the corresponding structure for this element) and/or col.	the claim in accordance with a quantization schema that varies with the dictates of a control signal <u>Structure:</u> DCT 37 (as shown in Fig. 2, and as described at cols. 6:3- 6, 14:27-36, and 14:66-67), including the frame difference signals input to this	control signal <u>Structure</u> : Quantizer vector selector 38 ("QVS"). The QVS is shown in context in Figure 2, and its general role is described at 5:60- 6:12. (The other elements cited in this passage are not part of the corresponding structure for this	with the dictates of a control signal <u>Structure</u> : Quantizer vector selector 38 ("QVS"). The QVS is shown in context in Figure 2, and its general role is described at 5:60- 6:12. (The other elements cited in this passage are not part of the corresponding

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		 14:67-col. 15:13); (2) Quantization encoder 81 and subtracter 84 (as shown in Figure 9 and as described at col. 15:61-16:5, and col. 16:12-22); or (3) Figure 10 (as described at col. 16:39-18:16) (The variable length encoders 46 and 47 discussed in this passage are not part of the corresponding structure for this element.). 	element and frequency domain coefficients output by this element; and quantizer vector selector 38 ("QVS") (as shown in Fig. 2, and its general role is described at cols. 5:60-6:12 and its internal circuitry as shown in Figs. 9 and 10, and described at cols. 15:57-18:16), including the frequency coefficient signals input to this element and the quantized superblock vector signals output by this element	element.) The internal circuitry of the QVS is shown in Figures 9 and 10, and described at 15:57-17:34. The elements shown in Figures 9 and 10 are part of the overall corresponding structure for this element. Certain components in the QVS are described further at 17:34- 18:16. (The variable length encoders 46 and 47 discussed in this passage are not part of the corresponding structure for this element.)	structure for this element.) The internal circuitry of the QVS is shown in Figures 9 and 10, and described at 15:57-17:34. The elements shown in Figures 9 and 10 are part of the overall corresponding structure for this element. Certain components in the QVS are described further at 17:34- 18:16. (The variable length encoders 46 and 47 discussed in this passage are not part of the corresponding structure for this element.)
		quantization schema:	quantization schema:	a way of quantizing	quantization schema:

CLAIM LANGUAGE (Disputed Terms in BOLD)AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION a way of quantizing	DEFENDANTS' PRELIMINARY CONSTRUCTION a structured	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION a way of quantizing
		framework for quantizing		
said coder including means, responsive to said applied next frame signals, to develop said control signal, which control signal varies throughout said applied next frame with changes in at least one selected characteristic of said applied next frame signals.	said coder including means, responsive to develop said control signal, which control signal varies throughout said applied next frame with changes in at least one selected characteristic of said applied next frame signals.: <u>Function</u> : developing the control signal, which varies throughout the applied next frame with changes in at least one selected characteristic of the applied next frame signals	means, responsive to said applied next frame signals, to develop said control signal, which control signal varies throughout said applied next frame with changes in at least one selected characteristic of said applied next frame signals: This limitation must be construed under 35 U.S.C. § 112(6). <u>Function:</u> developing the control signal mentioned earlier in the claim, which varies throughout the applied next frame with	Function: developing the control signal, which varies throughout the applied next frame with changes in at least one selected characteristic of the applied next frame signals <u>Structure</u> : perceptual coder 49 (as shown in Figure 2) including at least one of the following sets of internal circuitry: (1) generator 93 (as shown in Figure 12), where generator 93 includes at least texture processors 96 and 98, combiner 99, and mapping look up	Function: developing the control signal, which varies throughout the applied next frame with changes in at least one selected characteristic of the applied next frame signalsStructure: perceptual coder 49 (as shown in Figure 2) including at least one of the following sets of internal circuitry:(1) generator 93 (as shown in Figure 12), where generator 93 includes at least texture processors 96 and 98, combiner 99, and mapping look up teacter 100 (centre control of the control of th

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		Structure: perceptual coder 49 (as shown in Figure 2) including at least one of the following sets of internal circuitry: (1) generator 93 (as shown in Figure 12), where generator 93 includes at least texture processors 96 and 98, combiner 99, and mapping look up table 100 (as shown in Figure 13, and described at 20:32- 21:12, 21:42-43, 21:53-22:5), and where texture processors 96 and 98 each include at least look-up table 114 and one of the accumulators 106, 107 or 108 (as shown in Figure 14 and	selected characteristic of the applied next frame signals in response to said applied next frame signals <u>Structure:</u> perceptual coder 49 (as shown in Fig. 2) including at least one of the following sets of internal circuitry: (1) perceptual processor 93 (as shown in Fig. 12), where perceptual processor 93 includes at least texture processors 96 and 98, combiner 99, and mapping look up table 100 and base threshold look-up table 111 (as shown in Fig. 13, and described at cols. 20:32-21:12,	Figure 13, and described at 20:32- 21:12, 21:42-43, 21:53-22:5), and where texture processors 96 and 98 each include at least look-up table 114 and one of the accumulators 106, 107, or 1 08 (as shown in Figure 14 and described at 21:43-49); (2) generator 93 (as shown in Figure 12), where generator 93 includes at least: adder 101, brightness correction truncation circuit 97, and brightness correction look-up table 110 (as shown in Figure 13, and described at 21:27-34, 22:6-10); or	Figure 13, and described at 20:32- 21:12, 21:42-43, 21:53-22:5), and where texture processors 96 and 98 each include at least look-up table 114 and one of the accumulators 106, 107, or 1 08 (as shown in Figure 14 and described at 21:43-49); (2) generator 93 (as shown in Figure 12), where generator 93 includes at least: adder 101, brightness correction truncation circuit 97, and brightness correction look-up table 110 (as shown in Figure 13, and described at 21:27-34, 22:6-10); or
		described at 21:43-	21:41-42, 21:53-22:5		

ssor 91
¹ Igure
bed at

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			where perceptual		
			processor 93 includes		
			at least: adder 101,		
			brightness correction		
			truncation circuit 97,		
			and brightness		
			correction look-up		
			table 110 and base		
			threshold look-up		
			table 111 (as shown in		
			Fig. 13, and described		
			at cols. 21:24-34,		
			22:6-22) including		
			their interconnects,		
			the transformed image		
			information with the		
			mean removed $I_T(t-4)$		
			and mean signal M(t-		
			4) input into this		
			element and the		
			perceptual thresholds		
			PTij(t-4) output by		
			this element		
		consistent with claims	consistent with claims	Any of the following	consistent with claims
		1, 4 and 9	1, 4 and 9	characteristics of the	1, 4 and 9
				applied next frame	
		selected	selected	signals, alone or in	selected
		characteristic :	characteristic:	combination: (1) a	characteristic:
				measure of texture,	
CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
-----------------------------------------------	------------------------------------	--------------------------------------------	--------------------------------------------	-------------------------------------	-------------------------
		any characteristic of	any of the following	(2) a measure of	Any of the following
		the applied next frame	characteristics of the	brightness, or (3) a	characteristics of the
		signals,	applied next frame	measure of buffer	applied next frame
		including, but not	signals, alone or in	fullness.	signals, alone or in
		limited to, a measure	combination: (1) a		combination: (1) a
		of texture, a measure	measure of texture, or		measure of texture,
		of brightness, a	(2) a measure of		(2) a measure of
		measure of buffer	brightness		brightness, or (3) a
		fullness, temporal			measure of buffer
		differences, frequency			fullness.
		sensitivity, or			
		distortion			
"means, responsive to		This limitation does	This limitation must	Function: developing	Function: developing
said applied next		not require	be construed under 35	the control signal,	the control signal,
frame signals, to		construction under 35	U.S.C. § 112(6).	which varies	which varies
develop said control		U.S.C. § 112 (6). The		throughout	throughout
signal, which control		"means responsive	Function:	the applied next frame	the applied next frame
signal varies		to said applied next	developing the control	at least with changes	at least with changes
throughout said		frame" limitation is	signal, which varies	to a measure of	to a measure of
applied next frame		already recited in	throughout the applied	texture in the applied	texture in the applied
with changes in at		claim 1. Claim 4 only	next frame at least	next frame signals	next frame signals
least one selected		adds the "wherein	with changes to a		
characteristic of said		said selected	measure of texture in	Structure: perceptual	Structure: perceptual
applied next frame		characteristic is a	the applied next frame	coder 49 (as shown in	coder 49 (as shown in
signals"		measure of texture in	signals	Figure 2) including at	Figure 2) including at
		applied next frame		least a generator 93	least a generator 93
		signals" limitation.	Structure: perceptual	(as shown in Figure	(as shown in Figure
			coder 49 (as shown in	12), where generator	12), where generator
4. "The encoder of			Fig. 2) including at	93 includes at least	93 includes at least

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
claim 1 wherein said			least perceptual	the following internal	the following internal
selected			processor 93 (as	circuitry:	circuitry:
characteristic is a			shown in Fig. 12),		
measure of texture			where perceptual	texture processors 96	texture processors 96
in said applied next			processor 93 includes	and 98, combiner 99,	and 98, combiner 99,
frame signals"			at least texture	and mapping look up	and mapping look up
			processors 96 and 98,	table 100 (as shown in	table 100 (as shown in
			combiner 99, and	Figure 13, and	Figure 13, and
			mapping look up table	described at 20:32-	described at 20:32-
			100 and base	21:12, 21:42-43,	21:12, 21:42-43,
			threshold look-up	21:53-22:5:), where	21:53-22:5:), where
			table 111 (as shown in	texture processors 96	texture processors 96
			Fig. 13, and described	and 98 each	and 98 each
			at cols. 20:32-21:12,	include at least look-	include at least look-
			21:41-42, 21:53-22:5,	up table 114 and one	up table 114 and one
			and 22:12-22), and	of the accumulators	of the accumulators
			where texture	106, 107, or 108 (as	106, 107, or 108 (as
			processors 96 and 98	shown in Figure 14	shown in Figure 14
			each include at least	and described at	and described at
			look-up table 114 and	21:43-49)	21:43-49)
			one of the		
			accumulators 106,		
			107, or 108 (as shown		
			in Fig. 14 and		
			described at 21:43-		
			49), including their		
			interconnects, the		
			transformed image		
			information with the		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			mean removed $\dot{I}_{T}(t-4)$		
			and temporal frame		
			difference of the		
			transformed image		
			information with the		
			mean removed $\dot{I}_{T}(t-4)$		
			input into this element		
			and the perceptual		
			thresholds PTij(t-4)		
			output by this element		
		consistent with claims	consistent with claims		consistent with claims
		1, 4, 6, 17, 26, 27, 28	1, 4, 6, 17, 26, 27, 28		1, 4, 6, 17, 26, 27, 28
		and 29	and 29		and 29
		frame:	frame:		frame:
		1 4 4 6	1		1
		a complete set of	a complete picture		a complete set of
		digital representations	from a video sequence		digital representations
		for an image	• , • , 1 1 •	A C (1 C 11 ·	for an image
		consistent with claims	consistent with claims	Any of the following	consistent with claims
		1, 4 ana 9	1, 4 ana 9	characteristics of the	1, 4 ana 9
		l4l		applied next frame	141
		selected	selected	signals, alone or in	selected
		characteristic :	characteristic:	combination: (1) a	characteristic :
		any characteristic of	any of the following	(2) a manufactor of (2)	Any of the following
		the applied payt frame	any of the following	(2) a measure of (2) a	Any of the following
		aignolo	annliad next frame	brightness, or (3) a	characteristics of the
		signals,	applied next frame	fullness	applied next frame
		menuaing, but not	signals, alone or in	iunness.	signals, alone or in

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		limited to, a measure	combination: (1) a		combination: (1) a
		of texture, a measure	measure of texture, or		measure of texture,
		of brightness, a	(2) a measure of		(2) a measure of
		measure of buffer	brightness		brightness, or (3) a
		fullness, temporal			measure of buffer
		differences, frequency			fullness.
		sensitivity, or			
		distortion			
"means, responsive to		This limitation does	This limitation must		Function: developing
said applied next		not require	be construed under 35		the control signal,
frame signals, to		construction under 35	U.S.C. § 112(6).		which varies
develop said control		U.S.C. § 112 (6). The			throughout
signal, which control		"means responsive	Function:		the applied next frame
signal varies		to said applied next	developing the control		at least with changes
throughout said		frame" limitation is	signal, which varies		to a measure of
applied next frame		already recited in	throughout the applied		texture in the applied
with changes in at		claim 1. Claim 6 only	next frame at least		next frame signals,
least one selected		adds the "wherein	with changes to a		wherein said measure
characteristic of said		said measure of	measure of texture in		of texture is a
applied next frame		texture is a	the applied next frame		combination of a
signals"		combination of a	signals		texture measure of
		texture measure of			said applied next
		said applied next	Structure:		frame signals and of
		frame signals and of	perceptual coder 49		previously applied
6. The encoder of		previously applied	(as shown in Fig. 2)		next frame signals.
claim 4 wherein said		next frame signals"	including at least		
measure of texture is		limitation.	perceptual processor		Structure:
a combination of a			93 (as shown in Fig.		perceptual coder 49
texture measure of			12), where perceptual		(as shown in Figure 2)

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
said applied next			processor 93 includes		including at least a
frame signals and of			at least texture		generator 93 (as
previously applied			processors 96 and 98,		shown in Figure 12),
next frame signals.			combiner 99, and		where generator 93
			mapping look up		includes at least the
			tables 100 and base		following internal
			threshold look-up		circuitry:
			table 111 (as shown in		
			Fig. 13, and described		texture processors 96
			at cols. 20:32-21:12,		and 98, combiner 99,
			21:41-42-43, 21:53-		and mapping look up
			22:5, and 22:12-22),		table 100 (as shown in
			and where texture		Figure 13, and
			processors 96 and 98		described at 20:32-
			each include at least		21:12, 21:42-43,
			look-up table 114 and		21:53-22:5:), where
			one of the		texture processors 96
			accumulators 106,		and 98 each
			107, or 108 (as shown		include at least look-
			in Fig. 14 and		up table 114 and one
			described at 21:43-		of the accumulators
			49), including their		106, 107, or 108 (as
			interconnects, the		shown in Figure 14
			transformed image		and described at
			information with the		21:43-49)
			mean removed $\dot{I}_{T}(t-4)$		
			and temporal frame		
			difference of the		
			transformed image		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			information with the		
			mean removed $\dot{I}_{T}(t-4)$		
			input into this element		
			and the perceptual		
			thresholds PTij(t-4)		
			output by this element		
		consistent with claims	consistent with claims		consistent with claims
		1, 4, 6, 17, 26, 27, 28	1, 4, 6, 17, 26, 27, 28		1, 4, 6, 17, 26, 27, 28
		and 29	and 29		and 29
		frame:	frame:		frame:
		a complete set of	a complete picture		a complete set of
		digital representations	from a video sequence		digital representations
		for an image			for an image
8. The encoder of		consistent with claims	consistent with claims	hardware, which may	consistent with claims
claim 1 further		1, 8 and 29	1, 8 and 29	include a general-	1, 8 and 29
comprising an output				purpose processor	
buffer for receiving		coder:	coder:	programmed with	coder:
said encoder output				appropriate software,	
signals, and said		hardware, which may	hardware, which may	that changes a video	hardware, which may
coder comprising		include one or more	include a general-	signal from one form	include a general-
		circuits or processors	purpose processor	of representation to	purpose processor
		programmed with	programmed with	another	programmed with
		appropriate software,	appropriate software,		appropriate software,
		that changes a video	that changes a video		that changes a video
		signal from one form	signal from one form		signal from one form
		of representation to	of representation to		of representation to
		another	another		another

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
means for receiving		Function:	This limitation must	Function:	Function:
signals from said		receiving signals from	be construed under 35	receiving signals from	receiving signals from
output buffer that		said output buffer	U.S.C. § 112(6).	said output buffer that	said output buffer that
indicate the level of		1		indicate	indicate
buffer fullness of		Structure:	Function:	the level of buffer	the level of buffer
said output buffer.		perceptual coder 49,	receiving signals from	fullness of said output	fullness of said output
-		and its	said output buffer that	buffer	buffer
		interconnection to	indicate the level of		
		BFF block 56 (as	buffer fullness of said	Structure: perceptual	Structure: perceptual
		shown in Figure 2)	output buffer	coder 49, and its	coder 49, and its
				interconnection to	interconnection to
			Structure:	BFF block 56, as	BFF block 56, as
			perceptual coder 49	shown in Figure 2	shown in Figure 2
			(including internal		
			circuitry rate		
			processor 91 (as		
			shown in Fig. 12 and		
			described at cols.		
			22:36-23:45)		
			including buffer		
			fullness input to this		
			element and distortion		
			level D output by this		
			element; and		
			multiplier 92 (as		
			shown in Fig. 12 and		
			described at cols.		
			19:56-63 and 23:41-		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			43) including		
			distortion level D and		
			perceptual thresholds		
			PTij(t-4) input to this		
			element and target		
			distortion levels		
			output by this element		
9. The encoder of		The referenced	This language cannot		The referenced
claim 8 wherein		language is not	be construed because		language is not
selected		indefinite.	it is invalid due to		indefinite.
characteristic is a			indefiniteness and		
measure of buffer		This term should be	failure to satisfy 35		This term should be
fullness of said		given its plain	U.S.C. §§ 112(4) and		given its plain
output buffer.		meaning to one of	(6).		meaning to one of
		skill in the art, and			skill in the art, and
		therefore does not			therefore does not
		require construction.			require construction.
		consistent with claims	consistent with claims	Any of the following	consistent with claims
		1, 4 and 9	1, 4 and 9	characteristics of the	1, 4 and 9
				applied next frame	
		selected	selected	signals, alone or in	selected
		characteristic:	characteristic:	combination: (1) a	characteristic:
				measure of texture,	
		any characteristic of	any of the following	(2) a measure of	Any of the following
		the applied next frame	characteristics of the	brightness, or (3) a	characteristics of the
		signals,	applied next frame	measure of buffer	applied next frame
		including, but not	signals, alone or in	fullness.	signals, alone or in
		limited to, a measure	combination: (1) a		combination: (1) a
		of texture, a measure	measure of texture, or		measure of texture,

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		of brightness, a	(2) a measure of		(2) a measure of
		measure of buffer	brightness		brightness, or (3) a
		fullness, temporal			measure of buffer
		differences, frequency			fullness.
		sensitivity, or			
		distortion			
17. The encoder of		consistent with claims	consistent with claims		consistent with claims
claim 1 wherein said		1, 4, 6, 17, 26, 27, 28	1, 4, 6, 17, 26, 27, 28		1, 4, 6, 17, 26, 27, 28
next frame signals		and 29	and 29		and 29
comprise a sequence					
of signal sections,		frame:	frame:		frame:
each of which is					
related to a transform		a complete set of	a complete picture		a complete set of
of at least one block		digital representations	from a video sequence		digital representations
of said frame		for an image			for an image
difference signals, and					
each of which					
including a collection					
of N transform					
element signals, and					
said control signal					
comprising N control					
signal cells, where N					
in a constant, and					
each control signal					
cell controls the					
quantization schema					
tor a different one of					
said N transform					

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
element signals					
	transform element signals:	transform element signals:	transform element signals:		transform element signals:
	frequency domain coefficients	frequency domain coefficients	frequency domain coefficients		frequency domain coefficients
26. An encoder		Function:	This limitation must		Function:
comprising:		developing frame	be construed under 35		developing frame
prediction means		prediction signals	U.S.C. § 112(6).		prediction signals in
responsive to output					response to output
signals of said		Structure:	Function:		signals of the encoder
encoder, for developing frame prediction signals		inverse quantizer 39; inverse DCT 40; adder 41; and motion compensator 43 (as shown in Figure 2 and as described at col. 6:9-31, 40-46)	developing frame prediction signals in response to output signals of the encoder <u>Structure:</u> motion vector generator 13 (as shown in Fig. 1 and its internal circuitry		Structure: inverse quantizer 39; inverse DCT 40; adder 41; and motion compensator 43 (as shown in Figure 2 and as described at col. 6:9-31, 40-46)
			shown in Figs. 3-4, and described at cols. 4:35-47, 5:15-27, and col. 7:33-10:49), including the applied next frames I(t) and I(t-1) input to this		The Court requests the parties to discuss the motion vector generator 13 and motion vector selector/encoder 14 at the hearing 1

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			element and motion		
			vectors MV(t-1)		
			output by this		
			element;		
			motion vector		
			selector/encoder 14		
			(as shown in Fig 1		
			and its internal		
			circuitry shown in		
			Fig. 6, and described		
			at cols. 4:43-51, 5:23-		
			39, and 10:50-12:18),		
			including the motion		
			vector MV(t-1) input		
			to this element and		
			motion vectors MV(t-		
			2) output by this		
			element;		
			adder 41 (as shown in		
			Fig. 2 and described		
			at col. 6:19-22),		
			including all inputs		
			and outputs;		
			-		
			adder 54 (as shown in		
			Fig 2 and described		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			at col. 6:19-24), including all inputs and outputs; subtractor 44 (as shown in Fig. 2 and described at cols. 5:65-6:3, 6:3531-37, and 6:41-44), including all inputs		
			and outputs; multiplier 45 (as shown in Fig. 2 and described at cols. 5:65-6:3 and 6:35-39), including leak factor L(t-4) and displaced frame signal DF with the mean removed input to this element and the best estimation of image I(t-4) outputs by this element:		
			motion compensator 43 (as shown in Fig. 2 and described at cols.		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			5:32-37, 6:28-33,		
			6:40-41, and 12:20-		
			32), including the		
			motion vectors MV(t-		
			4) and previous frame		
			input to this element		
			and all inputs and the		
			estimate of the image		
			signal I(t-4) output by		
			this element outputs;		
			inverse quantizer 39		
			(as shown in Fig. 2		
			and its internal		
			circuitry in Fig. 11		
			and described at cols.		
			described at cols. 6:9-		
			18 and 18:36-68),		
			including scale factors		
			Sji and quantized		
			superblock vector		
			signals input to this		
			element and inversely		
			quantized frequency		
			coefficients output by		
			this element; and		
			inverse DCT 40 (as		
			shown in Fig. 2 and		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
	CONSTRUCTION	CONSTRUCTION	described at cols. 6:9-		
			14), including the		
			inversely quantized		
			frequency coefficients		
			input to this element		
			and approximated		
			frame difference		
			signals output by this		
			element		
		consistent with claims	consistent with claims		consistent with claims
		1, 4, 0, 1/, 20, 2/, 28	1, 4, 6, 17, 26, 27, 28		1, 4, 0, 1/, 20, 2/, 28
		ana 29	ana 29		ana 29
		frame:	frame:		frame:
		a complete set of	a complete picture		a complete set of
		digital representations	from a video sequence		digital representations
		for an image			for an image
means for		Function:	This limitation must		Function:
developing frame		developing frame	be construed under 35		developing frame
difference signals in		difference signals	U.S.C. § 112(6).		difference signals
response to said					
frame prediction		Structure:	Function:		Structure:
means and applied		subtracter 36 (as	developing frame		subtracter 36 (as
frame signals		shown in Figure 2 and	difference signals in		shown in Figure 2 and
		described at col 5:63-	response to the frame		described at col 5:63-
		6:4, 40-46)	prediction means and		6:4, 40-46)
			applied trame signals		[T]. Court (
					[The Court requests

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			Structure:		the parties to discuss
			subtractor 35 (as		the subtractor 35 at
			shown in Fig. 2 and		the hearing.]
			described at cols.		
			5:63-6:3), including		
			the input to this		
			element image signal		
			I(t-4) input to this		
			element and the frame		
			mean signal M(t-4)		
			input to this element		
			and the mean		
			excluded image signal		
			I(t-4) output by this		
			element; and		
			subtractor 36 (as		
			shown in Fig. 2 and		
			described at cols.		
			5:63-6:3), including		
			the mean excluded		
			image signal I(t-4)		
			input to this element		
			and best estimation of		
			image I(t-4) input to		
			this element and the		
			frame difference		
			signals output by this		
			element		

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
coder means, responsive to said frame difference signals and to a control signal, for encoding frame difference signals under direction of said control signal, where said coder means codes different portions of said frame difference signals with different coding schemas, where different coding schemas yield different numbers of bits when coding any given signal, said coder means thereby generates a number of bits when encoding said applied frame signals; and	Function: encoding the frame difference signals under direction of the control signal mentioned earlier in the claim	<u>Function:</u> encoding frame difference signals under direction of said control signal <u>Structure:</u> (a) (1) Quantizer vector selector 38 (as shown in Figure 2 and described at col. 6:6-9 (the other elements cited in this passage are not part of the corresponding structure for this element), col. 6:63- 64, col. 7:12-15 and col. 14:67-col. 15:18), or (2) Quantization encoder 81 and subtracter 84 (as shown in Figure 9 and as described at col. 15:61-16:3, col. 16:12-22 and col 16:23-32), or (3) Figure 10 (as	This limitation must be construed under 35 U.S.C. § 112(6). <u>Function:</u> encoding the frame difference signals under direction of the control signal mentioned earlier in the claim <u>Structure:</u> DCT 37 (as shown in Fig. 2, and as described at cols. 6:3- 6, 14:27-36, and 14:66-67), including the frame difference signals input to this element and frequency domain coefficients output by this element; quantizer vector selector 38 ("QVS") (as shown in Fig. 2, and its general role is		<u>Function:</u> encoding the frame difference signals under direction of the control signal mentioned earlier in the claim <u>Structure:</u> (a) (1) Quantizer vector selector 38 (as shown in Figure 2 and described at col. 6:6-9 (the other elements cited in this passage are not part of the corresponding structure for this element), col. 6:63- 64, col. 7:12-15 and col. 14:67-col. 15:18), or (2) Quantization encoder 81 and subtracter 84 (as shown in Figure 9 and as described at col. 15:61-16:3, col. 16:12-22 and col

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		described at col.	described at cols.		16:23-32), or (3)
		16:39-18:16) (The	5:60-6:12 and its		Figure 10 (as
		variable length	internal circuitry as		described at col.
		encoders 46 and 47	shown in Figs. 9 and		16:39-18:16) (The
		discussed in this	10, and described at		variable length
		passage are not part	cols. 15:57-18:16),		encoders 46 and 47
		of the corresponding	including the		discussed in this
		structure for this	frequency coefficient		passage are not part of
		element.); and	signals input to this		the corresponding
			element and the		structure for this
		(b) at least one of	quantized superblock		element.); and
		variable length	vector signals output		
		encoders 46 and 47	by this element; and		(b) variable length
		(as shown in FIG. 2			encoder 46 and 47 (as
		and described at col.	variable length		shown in Fig. 2 and
		17:41-46, 18:20-33).	encoder 46 and 47 (as		described at cols.
			shown in Fig. 2 and		17:46-18:33),
			described at cols.		including the
			17:46-18:33),		quantized superblock
			including the		vector signals input to
			quantized superblock		this element and
			vector signals input to		codebook vectors and
			this element and		quantized superblock
			codebook vectors and		vectors output by this
			quantized superblock		element
			vectors output by this		
			element		[The Court requests
					the parties to discuss
					why "at least one" in

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
(Disputed Terms in BOLD) control means for developing said control signal in response to said encoder output signals, to control the number of bits generated by said coder means while encoding said applied frame signals	PROPOSED CONSTRUCTION	PRELIMINARY CONSTRUCTIONFunction: developing said control signalStructure: perceptual coder 49 (as shown in Figure 2), including rate processor 91 (as shown in Figure 12 and described at	PRELIMINARY CONSTRUCTIONThis limitation must be construed under 35 U.S.C. § 112(6).Function: developing said control signal in response to said encoder output signals to control the number of bits generated by said coder means	CONSTRUCTION	Plaintiff's proposed construction at the hearing.] <u>Function:</u> developing said control signal in response to said encoder output signals to control the number of bits generated by said coder means while encoding the applied frame signals <u>Structure:</u>
0		22:36-23:40)	while encoding the applied frame signals <u>Structure:</u> buffer fullness and formatter 56 (as shown in Fig. 2 and described at cols. 23:47-24:52) including inputs codebook vectors and quantized superblock vectors as inputs and buffer fullness output		perceptual coder 49 (as shown in Figure 2), including rate processor 91 (as shown in Figure 12 and described at 22:36-23:40) [The Court requests the parties to discuss the buffer fullness and formatter 56 at the hearing.]

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
2022)			by this element: and		
			perceptual coder 49		
			(as shown in Fig. 2		
			including internal		
			circuitry rate		
			processor 91 (as		
			shown in Fig. 12 and		
			described at cols.		
			22:36-23:45)		
			including buffer		
			fullness input to this		
			element and distortion		
			level D output by this		
			element		
"control means for		This limitation does	This limitation must		Function:
developing said		not require	be construed under 35		developing said
control signal in		construction under 35	U.S.C. § 112(6).		control signal in
response to said		$U.S.C. \ \S \ 112 \ (6).$ The			response to said
encoder output		"control means for	Function:		encoder output signals
signals, to control the		developing said	developing said		to control the number
number of bits		control signal	control signal in		of bits generated by
generated by said		limitation is already	response to said		said coder means
coder means while		Claim 20 and adds	encoder output signals		while encoding the
from signals"		the "where said	of hits generated by		applied frame signals;
frame signals		antrol moons is	of one generated by		and in response to
		further responsive to	salu couel means		salu applieu frame
		said applied from	while encouring the		signals moullying the
		salu applied frame	applied frame signals;		developed control

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
29. "where said		signals" limitation.	and in response to		signal based on said
control means is			said applied frame		applied frame signals
further responsive to			signals modifying the		to control coding error
said applied frame			developed control		signals created in said
signals and modifies			signal based on said		coder in the course of
its developed control			applied frame signals		coding of said frame
signal based on said			to control coding error		difference signals
applied frame			signals created in said		
signals to control			coder in the course of		Structure:
coding error signals			coding of said frame		perceptual coder 49
created in said coder			difference signals		(as shown in Figure
in the course of					2), including rate
coding of said frame			Structure:		processor 91 (as
difference signals"			perceptual coder 49		shown in Figure 12
			(as shown in Fig. 2)		and described at
			including:		22:36-23:40)
			perceptual processor		[The Court requests
			93 (as shown in Fig.		the parties to discuss
			12 and its internal		the structure that goes
			circuitry in Figs. 13		with the additional
			and 14 and described		limitation of "where
			at cols. 19:1-23:46),		said control means is
			including the		further responsive to
			transformed image		said applied frame
			information with the		signals "at the
			mean removed $\dot{I}_{T}(t-4)$		hearing.]
			and mean signal M(t-		
			4) input into this		

CLAIM LANCUACE	ACREED	DI AINTIFF'S	DEFENDANTS'	COURT'S	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	PREVIOUS	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION	
			element and the		
			perceptual thresholds		
			PTij(t-4) output by		
			this element;		
			rate processor 91		
			further including		
			signal standard		
			deviation values σ as		
			an input; and		
			multiplier 92 (as		
			shown in Fig. 12 and		
			described at cols.		
			19:56-63 and 23:41-		
			43), including		
			distortion level D and		
			perceptual thresholds		
			PTij(t-4) input to this		
			element and target		
			distortion levels		
		• • • • • • • • •	output by this element		• • . 1 . 1 •
		consistent with claims	consistent with claims		consistent with claims
		1, 4, 6, 17, 26, 27, 28	1, 4, 6, 17, 26, 27, 28		1, 4, 6, 17, 26, 27, 28
		and 29	and 29		and 29
		fromo	fromo		fromo
		a complete set of	a complete picture		a complete set of

CLAIM LANGUAGE (Disputed Terms in BOLD)	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		digital representations for an image	from a video sequence		digital representations for an image

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
1. A method of	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	a rectangular array of	consistent with claims 1,
encoding a video signal,	7, 13 and 19	7, 13 and 19	7, 13 and 19	elements, at least 2	7, 13 and 19
comprising the steps of:				elements high and 2	
	NxM matrix:	NxM matrix:	NxM matrix:	elements wide	NxM matrix:
generating a set of					
frequency coefficient	a rectangular array of	a rectangular array of	a rectangular array of		a rectangular array of
signals, the set	elements, at least 2	elements, at least 2	elements, at least 2		elements, at least 2
representing the video	elements high and at	elements high and at	elements high and at		elements high and at
signal, and	least 2 elements wide	least 2 elements wide	least 2 elements wide		least 2 elements wide
corresponding to an					
NxM matrix, wherein					
each of the frequency					
coefficient signals					
corresponds to a					
predetermined					
horizontal coordinate					
and a predetermined					
vertical coordinate in					
the matrix;					

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency coefficients	7, 13 and 19
				created by transform	
	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
	signals:	signals:	signals:	discrete cosine	signals:
				transform (DCT)	
	signals containing	signals containing	signals containing		signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete	discrete	discrete cosine		discrete
	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)
scanning a first subset	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
of the frequency	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
coefficient signals	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
within the set in a				encoding.	
predetermined first	scanning order:	scanning order:	scanning order:		scanning order:
subset scanning order,					
as represented by the	the sequence into which	the sequence into which	the sequence into which		the sequence into which
tollowing list of	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
coordinate pairs, each	are organized prior to	are organized prior to	are organized prior to		are organized prior to
pair	encoding	encoding	encoding.		encoding
representing a					
horizontal and vertical					
coordinate in the matrix.					

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
to create an ordered set					
of frequency coefficient					
signals:					
(0, 0), (0, 1), (0, 2), (0, 0)					
3), (1, 0), (1, 1), (2, 0),					
(2, 1), (1, 2), (1, 3), (0,					
4), (0, 5), (0, 6), (0, 7)					
(1, 7); and,					
	scanning a first subset	scanning a first subset	scanning a first subset		scanning a first subset
	of the frequency	of the frequency	of the frequency		of the frequency
	coefficient signals:	coefficient:	coefficient:		coefficient signals:
	organizing a first subset	organizing a first subset	organizing a first subset		organizing a first subset
	of frequency	of frequency	of frequency		of frequency
	coefficients into a	coefficients into a	coefficients into a		coefficients into a
	sequence prior to	sequence prior to	sequence prior to		sequence prior to
	encoding	encoding	encoding		encoding
generating an encoded		consistent with claims 1,	consistent with claims 1,	generating a video	consistent with claims I,
video signal, the		7, 13, 19	7, 13, 19	signal using variable	7, 13, 19
encoded video signal				word length encoding	
including the ordered		generating an encoded	generating an encoded		generating an encoded
set of frequency		video signal:	video signal:		video signal:
coefficient signals.					

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
		generating a video	generating a video		generating a video
		signal using variable	signal using variable		signal using variable
		word length encoding or	length encoding		word length encoding
		other entropy encoding			
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency coefficients	7, 13 and 19
				created by transform	
	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
	signals:	signals:	signals:	discrete cosine	signals:
				transform (DCT)	
	signals containing	signals containing	signals containing		signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete	discrete	discrete cosine		discrete
	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)
					·····
2. The method of claim		$\begin{array}{c} \text{consistent with claims } 2, \\ 2, 7, 14, 15, \dots, 10 \end{array}$	$\begin{array}{c} \text{consistent with claims } 2, \\ 2, 7, 14, 15, 10 \end{array}$		consistent with claims 2 ,
I wherein the scanning		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19		3, 7, 14, 15 and 19
step is performed in		Irame:	e		irame:
response to a frame			Irame:		1-4
format associated with		a complete set of digital	1.4		a complete set of digital
the video signal.		representations for an	a complete picture from		representations for an
		image	a video sequence		image
		consistent with claims 2,	$\begin{array}{c} \text{consistent with claims } 2, \\ 2, 7, 14, 15, \dots, 10 \end{array}$	interfaced format or	consistent with claims 2 ,
		<i>3, 7, 14, 15 and 19</i>	5, 7, 14, 15 and 19	progressive format	5, 7, 14, 15 and 19
					trame format:

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
		frame format:	frame format:		interlaced format or
					progressive format
		interlaced format or	interlaced formatted		
		progressive format	picture or progressive		
			formatted picture		
3. The method of claim		consistent with claims 2,	consistent with claims 2,		consistent with claims 2,
2 in which the frame		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19		3, 7, 14, 15 and 19
format is an interlaced					
frame format.		frame:	frame:		frame:
		a complete set of digital	a complete picture from		a complete set of digital
		representations for an	a video sequence		representations for an
		image			image
		consistent with claims 2,	consistent with claims 2,	interlaced format or	consistent with claims 2,
		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19	progressive format	3, 7, 14, 15 and 19
					frame format:
		frame format:	frame format:		interlaced format or
		· · · · · 1 · 1 - 6 - · · · · · · · ·			progressive format
		interlaced format or	interlaced formatted		
		progressive format	picture or progressive		
			formatted picture		
4. The method of claim	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
1 further including a	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
step of scanning a	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
second subset of the				encoding.	
frequency coefficient	scanning order:	scanning order:	scanning order:		scanning order:
signals within the set in					

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
a predetermined second	the sequence into which	the sequence into which	the sequence into which		the sequence into which
subset scanning order	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
such that the ordered set	are organized prior to	are organized prior to	are organized prior to		are organized prior to
includes frequency	encoding	encoding	encoding		encoding
coefficient signals in the					
second subset, wherein					
the second subset					
scanning order is					
represented by the					
following list of					
coordinate pairs:					
(1, 6), (1, 5), (1, 4), (2,					
3), (2, 2),					
(3, 0), (3, 1), (4, 0), (4, 1)					
$1), (3, 2), (3, 3), (2, 4), \\ (2, 5), (2, 6), (2, 7)$					
(2, 5), (2, 6), (2, 7).				• • •	• • .1 1 • 1
	consistent with claims I ,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency coefficients	7, 13 and 19
	0 001 1	o oo ,	o oo••	created by transform	o oo•••
	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
	signals:	signals:	signals:	discrete cosine	signals:
				transform (DCT)	
	signals containing	signals containing	signals containing		signals containing

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete	discrete	discrete cosine		discrete
	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)
5. The method of claim	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
4 further including a	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
step of scanning a third	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
subset of the frequency				encoding.	
coefficient signals	scanning order:	scanning order:	scanning order:		scanning order:
within					
	the sequence into which	the sequence into which	the sequence into which		the sequence into which
the set in a	frequency	frequency	frequency coefficients		frequency coefficients
predetermined third			are organized prior to		are organized prior to
subset scanning order	coefficients are	coefficients are	encoding.		encoding
such that the ordered set	organized prior to	organized prior to			
includes the scanned	encoding	encoding			
frequency coefficient					
signals in the third					
subset, wherein the third					
subset scanning order is					
represented by the					
following list of					
coordinate pairs:					
(3, 4), (3, 5), (3, 6), (3,					

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
7), (4, 2), (4, 3), (5, 0),					
(5, 1), (6, 0), (6, 1), (5,					
2), (5, 3), (4, 4), (4, 5),					
(4, 6)					
(A, 7)					
(4, 7).	a angiatant with alging 1	a angiatant with alaing 1	a angigtant with alging 1	signals containing	a angiatant with alaing 1
	$\begin{array}{c} \text{consistent with claims 1,} \\ 7 12 \dots 1 \\ 10 \end{array}$	$\frac{1}{2} = \frac{1}{2} = \frac{1}$	$\frac{1}{2} = \frac{1}{2} = \frac{1}$	signais containing	$\frac{12}{12} = \frac{10}{12}$
	7, 15 ana 19	7, 15 ana 19	7, 15 ana 19	arequency coefficients	7, 15 ana 19
	fragman an apofficiant	fuggionar agafficiant	fuggionar agafficiant	created by transform	frequency coefficient
	aismola.	airequency coefficient	airequency coefficient	diagnate agains	signala.
	signals:	signais:	signais:	discrete cosine	signals:
	aianala aantainina	signala agntaining	aionala aontainina	(DC1)	si su sla soutsiuiu s
	signals containing	signals containing	signals containing		signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete	discrete	discrete cosine		discrete
	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)
	• , , •.1 1 • 1	• , , •,1 1 • 1	• , , •.1 1 • 1	.1 • . 1• 1	• , , •,1 1 • 7
b. The method of claim	consistent with claims I ,	consistent with claims I ,	consistent with claims I ,	the sequence into which	consistent with claims I ,
further including a step	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	requency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
of scanning a fourth	13, 10, 17, 18, 19	13, 10, 17, 18, 19	13, 10, 17, 18, 19	are organized prior to	13, 10, 17, 18, 19
subset of the frequency				encoding.	
coefficient signals	scanning order:	scanning order:	scanning order:		scanning order:
within the set in a					

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
predetermined fourth	the sequence into which	the sequence into which	the sequence into which		the sequence into which
subset scanning order	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
such that the ordered set	are organized prior to	are organized prior to	are organized prior to		are organized prior to
includes the scanned	encoding	encoding	encoding.		encoding
frequency coefficient					
signals in the fourth					
subset, wherein the					
fourth subset scanning					
order is represented by					
the following list of					
coordinate pairs:					
(5,4), (5,5), (5,6), (5,6)					
/), (6, 2), (6, 3), (7, 0),					
(7, 1), (7, 2), (7, 3), (6, 7)					
(4), (6, 5), (6, 6), (6, 7), (7, 6), (7, 7), (7, 6), (7, 6), (7, 7), (7, 6), (7, 7), (7, 6), (7, 7), (7, 6), (7, 7), (7, 6), (7, 7), (7, 6), (7, 7), (7, 6), (7, 7), (7, 6), (7, 7), (7, 6), (7, 7), (7, 6), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7), (7, 7),					
(/, 4), (/, 5), (/, 6), (/,					
/).					
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency	7, 13 and 19
				coefficients created by	

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	frequency coefficient	frequency coefficient	frequency coefficient	transform	frequency coefficient
	signals:	signals:	signals:	coding, such as the	signals:
				discrete cosine	
	signals containing	signals containing	signals containing	transform (DCT)	signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete	discrete	discrete cosine		discrete
	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)
7. A method for	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,
encoding a video signal,	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency coefficients	7, 13 and 19
comprising the steps of:				created by transform	
	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
generating a set of	signals:	signals:	signals:	discrete cosine	signals:
frequency coefficient				transform (DCT)	
signals, the set	signals containing	signals containing	signals containing		signals containing
representing the video	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
signal, wherein the set	created by transform	created by transform	created by transform		created by transform
corresponds to an NxM	coding, such as the	coding, such as the	coding, such as the		coding, such as the
matrix and each of the	discrete	discrete	discrete cosine		discrete
frequency coefficient	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)
signals corresponds to a					
predetermined					
horizontal coordinate					
and a predetermined					
vertical coordinate in					1

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
the matrix;					
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	a rectangular array of	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	elements, at least 2	7, 13 and 19
				elements high and 2	
	NxM matrix:	NxM matrix:	NxM matrix:	elements wide	NxM matrix:
	a rectangular array of	a rectangular array of	a rectangular array of		a rectangular array of
	elements, at least 2	elements, at least 2	elements, at least 2		elements, at least 2
	elements high and 2 at	elements high and at	elements high and at		elements high and 2 at
	least elements wide	least 2 elements wide	least 2 elements wide		least elements wide
alternatively selecting		consistent with claims 7	consistent with claims 7	The Court construes the	consistent with claims 7
between a first		and 19	and 19	entire phrase as:	and 19
scanning					
order and a second					The Court construes the
scanning order in					entire phrase as:
response to a frame					alternativaly calacte a
format associated with		alternatively selecting a	alternatively selecting a	alternatively selects a	anermatively selects a
the video signal;		pre-determined	nredetermined scanning	nre-determined	sconning order in
		scanning order in	order in response to	scanning order in	response to whether the
		response to whether the	whether the picture is	response to whether the	video signal is
		video signal is	progressive format or	video signal is	video signal is
		associated with	interlaced format	progressive format or	interloced format
		progressive format or	internation format	interlaced format	mundutu Iumai
		interlaced format			
	consistent with claims 1.	consistent with claims 1.	consistent with claims 1.	the sequence into which	consistent with claims 1.
	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
				encoding.	
	scanning order:	scanning order:	scanning order:		scanning order:
	the sequence into which	the sequence into which	the sequence into which		the sequence into which
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	are	are	are organized prior to		are
			encoding.		
	organized prior to	organized prior to			organized prior to
	encoding	encoding			encoding
		consistent with claims 2,	consistent with claims 2,		consistent with claims 2,
		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19		3, 7, 14, 15 and 19
		frame:	frame:		frame:
		a complete set of digital	a complete picture from		a complete set of digital
		representations for an	a video sequence		representations for an
		image			image
		consistent with claims 2,	consistent with claims 2,	interlaced format or	consistent with claims 2,
		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19	progressive format	3, 7, 14, 15 and 19
		frame format:	frame format:		frame format:
		intarlaged formerst or			
		interfaced format or	interlaced formatted		interlaced format or
		progressive format	picture or progressive		progressive format
			formatted picture		
scanning the set of	scanning the set of	scanning the set of	scanning the set of	organizing the	scanning the set of

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
frequency coefficient	frequency coefficient	frequency coefficient	frequency coefficient	frequency coefficients	frequency coefficient
signals according to the	signals:	signals:	signals:	into a sequence prior to	signals:
selected scanning order				encoding	
to create an ordered set	organizing the	organizing the	organizing the		organizing the
of frequency coefficient	frequency	frequency	frequency coefficients		frequency
signals; and	coefficients into a	coefficients into a	into a sequence prior to		coefficients into a
	sequence prior to	sequence prior to	encoding		sequence prior to
	encoding	encoding			encoding
	frequency coefficient	frequency coefficient	consistent with claims 1,	signals containing	frequency coefficient
	signals:	signals:	7, 13 and 19	frequency coefficients	signals:
				created by transform	
	consistent with claims 1,	consistent with claims 1,	frequency coefficient	coding, such as the	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	signals:	discrete cosine	7, 13 and 19
				transform (DCT)	
	signals containing	signals containing	signals containing		signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete	discrete	discrete cosine		discrete
	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
				encoding.	
	scanning order:	scanning order:	scanning order:		scanning order:
	the sequence into which	the sequence into which	the sequence into which		the sequence into which
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	are organized prior to	are organized prior to	are organized prior to		are organized prior to
	encoding	encoding	encoding.		encoding
generating an encoded		consistent with claims 1,	consistent with claims 1,	generating a video	consistent with claims 1,
video signal, the		7, 13, 19	7, 13, 19	signal using variable	7, 13, 19
encoded video signal		generating an encoded		word length encoding	
including the ordered		video signal	generating an encoded		generating an encoded
set of frequency			video signal		video signal
coefficient signals.		generating a video			
		signal using variable	generating a video		generating a video
		word length encoding or	signal using variable		signal using variable
		other entropy encoding	word length encodingr		word length encoding
CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
------------------------	----------------------------	----------------------------	----------------------------	----------------------------	----------------------------
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency coefficients	7, 13 and 19
				created by transform	
	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
	signals:	signals:	signals:	discrete cosine	signals:
				transform (DCT)	
	signals containing	signals containing	signals containing		signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete	discrete	discrete cosine		discrete
	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)
8. The method of claim	zigzag scanning order:	zigzag scanning order:	zigzag scanning order:	the scanning order	zigzag scanning order:
7 in which the first				shown in Fig. 3 for an	
scanning order	the scanning order	MPT agrees with	the scanning order	8x8 block, which may	the scanning order
comprises a zigzag	shown in Fig. 3 for an	Defendants' proposed	shown in Fig. 3 for an	be scaled to fit different	shown in Fig. 3 for an
scanning order.	8x8 block, which may	construction for this	8x8 block, which may	block sizes provided	8x8 block, which may
	be scaled to fit different	term.	be scaled to fit different	that the scanning	be scaled to fit different
	block sizes provided		block sizes provided	procedure remains the	block sizes provided
	that the scanning		that the scanning	same as that shown in	that the scanning
	procedure remains the		procedure remains the	Fig. 3.	procedure remains the
	same as that shown in		same as that shown in		same as that shown in
	Fig. 3		Fig. 3.		Fig. 3
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
			scanning order:	encoding.	
	scanning order:	scanning order:			scanning order:
			the sequence into which		
	the sequence into which	the sequence into which	frequency coefficients		the sequence into which
	frequency coefficients	frequency coefficients	are organized prior to		frequency coefficients
	are organized prior to	are organized prior to	encoding.		are organized prior to
	encoding	encoding			encoding
9. The method of claim	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
7 in which the second	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
scanning order includes	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
a first subset scanning				encoding.	
order represented by the	scanning order:	scanning order:	scanning order:		scanning order:
following list of					
coordinate pairs, each	the sequence into which	the sequence into which	the sequence into which		the sequence into which
pair representing a	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
horizontal and vertical	are organized prior to	are organized prior to	are organized prior to		are organized prior to
coordinate in the matrix:	encoding	encoding	encoding.		encoding
(0, 0), (0, 1), (0, 2), (0,					
3), (1, 0), (1, 1), (2, 0),					
(2, 1), (1, 2), (1, 3), (0,					
4), (0, 5), (0, 6), (0, 7)					
(1,7)					
10. The method of claim	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
9 in which the second	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
scanning order further	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
includes a second subset				encoding.	

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
scanning order matrix	scanning order:	scanning order:	scanning order:		scanning order:
such that the ordered set					
includes frequency	the sequence into which	the sequence into which	the sequence into which		the sequence into which
coefficient signals in a	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
second subset, the	are organized prior to	are organized prior to	are organized prior to		are organized prior to
second subset scanning	encoding	encoding	encoding.		encoding
order represented by the					
following list of					
coordinate pairs, each					
pair representing a					
horizontal and vertical					
coordinate in the matrix:					
(1, 6), (1, 5), (1,4), (2,					
3), (2, 2), (3, 0), (3, 1),					
(4, 0), (4, 1), (3, 2), (3,					
3), (2, 4), (2, 5), (2, 6),					
(2, 7).					
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency coefficients	7, 13 and 19
				created by transform	
	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
	signals:	signals:	signals:	discrete cosine	signals:
				transform (DCT)	
	signals containing	signals containing	signals containing		signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete	discrete	discrete cosine		discrete
	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)
11. The method of claim	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
in which the second	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
scanning order further	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
includes a third subset				encoding.	
scanning order matrix	scanning order:	scanning order:	scanning order:		scanning order:
such that the ordered set					
includes frequency	the sequence into which	the sequence into which	the sequence into which		the sequence into which
coefficient signals in a	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
third subset, the third	are organized prior to	are organized prior to	are organized prior to		are organized prior to
subset scanning order	encoding	encoding	encoding.		encoding
represented by the					
following list of					
coordinate pairs, each					
pair representing a					
horizontal and vertical					
coordinate in the matrix:					
(3, 4), (3, 5), (3, 6), (3, 6)					
7), (4, 2), (4, 3), (5, 0),					
(5, 1), (6, 0), (6, 1), (5, -)					
(2), (5, 3), (4, 4), (4, 5),					
(4, 6) (4, 7).					
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency coefficients	7, 13 and 19
				created by transform	
	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
	signals:	signals:	signals:	discrete cosine	signals:
				transform (DCT)	
	signals containing	signals containing	signals containing		signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete	discrete	discrete cosine		discrete
	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)
12. The method of claim	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
11 in which the second	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
scanning order further	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
includes a fourth subset				encoding.	
scanning order matrix	scanning order:	scanning order:	scanning order:		scanning order:
such that the ordered set					
includes frequency	the sequence into which	the sequence into which	the sequence into which		the sequence into which
coefficient signals in the	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
fourth subset, the fourth	are organized prior to	are organized prior to	are organized prior to		are organized prior to
subset scanning order	encoding	encoding	encoding.		encoding
represented by the					
following list of					
coordinate pairs, each					
pair representing a					
horizontal and vertical					

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
coordinate in the matrix:					
(5,4), (5, 5), (5, 6), (5,					
7), (6, 2), (6, 3), (7, 0),					
(7, 1), (7, 2), (7, 3), (6,					
4), (6, 5), (6, 6), (6, 7),					
(7, 4), (7, 5), (7, 6), (7,					
7).					
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency coefficients	7, 13 and 19
				created by transform	
	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
	signals:	signals:	signals:	discrete cosine	signals:
				transform (DCT)	
	signals containing	signals containing	signals containing		signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete cosine	discrete	discrete cosine		discrete cosine
	transform (DCT)	cosine transform (DCT)	transform (DCT)		transform (DCT)
13. An apparatus for		consistent with claims	consistent with claims	hardware, which may	consistent with claims
encoding a video signal,		13 and 19	13 and 19	include a general-	13 and 19
comprising: a discrete				purpose processor	
cosine transform		discrete cosine	discrete cosine	programmed with	discrete cosine
coefficient generator		transform coefficient	transform coefficient	appropriate software,	transform coefficient
for generating a set of		generator:	generator:	that uses a discrete	generator:
frequency coefficient				cosine transform to	

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
signals, the set		hardware, which may	hardware, which may	create frequency	hardware, which may
representing the video		include one or more	include a general-	coefficients	include a general-
signal and		circuits	purpose processor		purpose processor
corresponding to an		or processors	programmed with		programmed with
NxM matrix, wherein		programmed with	appropriate software,		appropriate software,
each of the frequency		appropriate software,	that uses a discrete		that uses a discrete
coefficient signals		that uses a discrete	cosine transform to		cosine transform to
corresponds to a		cosine transform or	create frequency		create frequency
predetermined		similar transform to	coefficients		coefficients
horizontal coordinate		create frequency			
and a predetermined		coefficients			
vertical coordinate in					
the matrix					
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	a rectangular array of	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	elements, at least 2	7, 13 and 19
				elements high and 2	
	NxM matrix:	NxM matrix:	NxM matrix:	elements wide	NxM matrix:
	a rectangular array of	a rectangular array of	a rectangular array of		a rectangular array of
	elements, at least 2	elements, at least 2	elements, at least 2		elements, at least 2
	elements high and at	elements high and at	elements high and at		elements high and at
	least 2 elements wide	least 2 elements wide	least 2 elements wide		least 2 elements wide

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency coefficients	7, 13 and 19
				created by transform	
	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
	signals:	signals:	signals:	discrete cosine	signals:
				transform (DCT)	
	signals containing	signals containing	signals containing		signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete	discrete	discrete cosine		discrete
	cosine transform (DCT)	cosine transform (DCT)	transform (DCT)		cosine transform (DCT)

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
a scanner for scanning a	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
first subset of the	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
frequency coefficient	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
signals within the set in				encoding.	
a predetermined first	scanning order:	scanning order:	scanning order:		scanning order:
subset scanning order,					
as represented by the	the sequence into which	the sequence into which	the sequence into which		the sequence into which
following list of	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
coordinate pairs, each	are organized prior to	are organized prior to	are organized prior to		are organized prior to
pair representing a	encoding	encoding	encoding.		encoding
horizontal and vertical					
coordinate in the matrix,					
to create an ordered set					
of frequency coefficient					
signals:					
(0, 0), (0, 1), (0, 2), (0,					
3), (1, 0), (1, 1), (2, 0),					
(2, 1), (1, 2), (1, 3), (0,					
4), (0, 5), (0, 6), (0, 7)					
(1, 7); and,					
means for generating		consistent with claims	consistent with claims		consistent with claims
an encoded video		13 and 19	13 and 19		13 and 19
signal, the encoded					
video signal including		Function: generating an	This limitation must be		Function: generating an
the ordered set of		encoded video signal,	construed under 35		encoded video signal,
frequency coefficient		the encoded video	U.S.C. § 112(6).		the encoded video
signals		signal including the			signal including the

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
		ordered set of frequency	Function: generating an		ordered set of frequency
		coefficient signals	encoded video signal,		coefficient signals
			the encoded video		
		Structure:	signal including the		Structure: variable word
		(a) variable word length	ordered set of frequency		length encoder 990 (as
		encoder 990 (as shown	coefficient signals		shown in Fig. 9 and as
		in			described at 7:13-37).
		Fig. 9 and as described	Structure: variable word		
		at 7:13-16); or	length encoder 990 (as		
			shown in Fig. 9 and as		
		(b) encoder 190 (as	described at 7:13-37).		
		shown in Fig. 1 and as			
		described at col. 2:53-			
		57).			
		consistent with claims 1,	consistent with claims 1,	generating a video	consistent with claims 1,
		7, 13, 19	7, 13, 19	signal using variable	7, 13, 19
				word length encoding	
		generating an encoded	generating an encoded		generating an encoded
		video signal:	video signal:		video signal:
		generating a video	generating a video		generating a video
		signal using variable	signal using variable		signal using variable
		word length encoding or	word length encoding		word length encoding
		other entropy encoding			
14. The apparatus of		consistent with claims 2,	consistent with claims 2,		consistent with claims 2,
claim 13 in which the		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19		3, 7, 14, 15 and 19
scanner performs the					

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
scanning in response to		frame:	frame:		frame:
a frame format					
associated with the		a complete set of digital	a complete picture from		a complete set of digital
video signal.		representations for an	a video sequence		representations for an
		image			image
		consistent with claims 2,	consistent with claims 2,	interlaced format or	consistent with claims 2,
		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19	progressive format	3, 7, 14, 15 and 19
		frame format:	frame format:		frame format:
		interlaced format or	interlaced formatted		interlaced format or
		progressive format	nicture or progressive		progressive format
			formatted picture		
15. The apparatus of		consistent with claims 2,	consistent with claims 2,		consistent with claims 2,
claim 14 in which the		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19		3, 7, 14, 15 and 19
frame format is an					
interlaced frame		frame:	frame:		frame:
format.					
		a complete set of digital	a complete picture from		a complete set of digital
		representations for an	a video sequence		representations for an
		image			image
		consistent with claims 2,	consistent with claims 2,	interlaced format or	consistent with claims 2,
		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19	progressive format	3, 7, 14, 15 and 19
					frame format:
		frame format:	frame format:		interlaced format or
		interlaged for market and			progressive format
		interfaced format or	interlaced formatted		

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
		progressive format	picture or progressive		
			formatted picture		
19. An apparatus for		consistent with claims	consistent with claims	hardware, which may	consistent with claims
encoding a video signal,		13 and 19	13 and 19	include a general-	13 and 19
comprising:				purpose processor	
		discrete cosine	discrete cosine	programmed with	discrete cosine
a discrete cosine		transform coefficient	transform coefficient	appropriate software,	transform coefficient
transform generator		generator:	generator:	that uses a discrete	generator:
for generating a set of				cosine transform to	
frequency coefficient		hardware, which may	hardware, which may	create frequency	hardware, which may
signals, the set		include one or more	include a general-	coefficients	include a general-
representing the video		circuits	purpose processor		purpose processor
signal and		or processors	programmed with		programmed with
corresponding to an		programmed with	appropriate software,		appropriate software,
NxM matrix, wherein		appropriate software,	that uses a discrete		that uses a discrete
each of the frequency		that uses a discrete	cosine transform to		cosine transform to
coefficient signals		cosine transform or	create frequency		create frequency
corresponds to a		similar transform to	coefficients		coefficients
predetermined		create frequency			
horizontal coordinate		coefficients			
and a predetermined					
vertical coordinate in					
the matrix;					
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	a rectangular array of	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	elements, at least 2	7, 13 and 19
				elements high and 2	
	NxM matrix:	NxM matrix:	NxM matrix:	elements wide	NxM matrix:

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	a rectangular array of	a rectangular array of	a rectangular array of		a rectangular array of
	elements, at least 2	elements, at least 2	elements, at least 2		elements, at least 2
	elements high and at	elements high and at	elements high and at		elements high and at
	least 2 elements wide	least 2 elements wide	least 2 elements wide		least 2 elements wide
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	signals containing	consistent with claims 1,
	7, 13 and 19	7, 13 and 19	7, 13 and 19	frequency coefficients	7, 13 and 19
				created by transform	
	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
	signals:	signals:	signals:	discrete cosine	signals:
				transform (DCT)	
	signals containing	signals containing	signals containing		signals containing
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete cosine	discrete	discrete cosine		discrete cosine
	transform (DCT)	cosine transform (DCT)	transform (DCT)		transform (DCT)
a scan selector for		consistent with claims 7	consistent with claims 7	The Court construed the	consistent with claims 7
alternatively selecting		and 19	and 19	entire element as:	and 19
between a first					
scanning order and a		alternatively selecting a	alternatively selecting a	hardware, which may	The Court construed the
second scanning order		pre-determined	predetermined scanning	include a general-	entire element as:
in response to a frame		scanning order in	order in response to	purpose processor	
format associated with		response to whether the	whether the picture is	programmed with	hardware, which may
the video signal;		video signal is	progressive format or	appropriate software	include a general-
		associated with	interlaced format	that alternatively selects	purpose processor
		progressive format or		a pre-determined	programmed with

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
		interlaced format		scanning order in	appropriate software
				response to whether the	that alternatively selects
				video signal is	a pre-determined
				progressive format or	scanning order in
				interlaced format	response to whether the
					video signal is
					progressive format or
					interlaced format
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
				encoding.	
	scanning order:	scanning order:	scanning order:		scanning order:
	the sequence into which	the sequence into which	the sequence into which		the sequence into which
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	are organized prior to	are organized prior to	are organized prior to		are organized prior to
	encoding	encoding	encoding		encoding
		consistent with claims 2,	consistent with claims 2,		consistent with claims 2,
		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19		3, 7, 14, 15 and 19
			2		-
		frame:	frame:		frame:
		a complete set of digital	a complete picture from		a complete set of digital
		representations for an	a video sequence		representations for an
		image			image
		consistent with claims 2,	consistent with claims 2,	interlaced format or	consistent with claims 2,

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
		3, 7, 14, 15 and 19	3, 7, 14, 15 and 19	progressive format	3, 7, 14, 15 and 19
		frame format:	frame format:		frame format:
		interlaced format or progressive format	interlaced formatted picture or progressive formatted picture		interlaced format or progressive format
a scanner for scanning the set of frequency	consistent with claims 1, 7, 13 and 19	consistent with claims 1, 7, 13 and 19	consistent with claims 1, 7, 13 and 19	signals containing frequency coefficients	consistent with claims 1, 7, 13 and 19
according to the	frequency coefficient	frequency coefficient	frequency coefficient	coding, such as the	frequency coefficient
selected scanning order to create an ordered set	signals:	signals:	signals:	discrete cosine transform (DCT)	signals:
of frequency coefficient	signals containing	signals containing	signals containing		signals containing
signals; and,	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	created by transform	created by transform	created by transform		created by transform
	coding, such as the	coding, such as the	coding, such as the		coding, such as the
	discrete cosine	discrete	discrete cosine		discrete cosine
	transform (DCT)	cosine transform (DCT)	transform (DCT)		transform (DCT)
	consistent with claims 1,	consistent with claims 1,	consistent with claims 1,	the sequence into which	consistent with claims 1,
	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	4, 5, 7, 8, 9, 10, 11, 12,	frequency coefficients	4, 5, 7, 8, 9, 10, 11, 12,
	13, 16, 17, 18, 19	13, 16, 17, 18, 19	13, 16, 17, 18, 19	are organized prior to	13, 16, 17, 18, 19
				encoding.	
	scanning order:	scanning order:	scanning order:		scanning order:
	the sequence into which	the sequence into which	the sequence into which		the sequence into which

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
	are organized prior to	are organized prior to	are organized prior to		are organized prior to
	encoding	encoding	encoding.		encoding
a means for generating		consistent with claims	consistent with claims	Function:	consistent with claims
an encoded video		13 and 19	13 and 19	generating an encoded	13 and 19
signal, the encoded				video signal, the	
video signal including		Function: generating an	This limitation must be	encoded video signal	Function:
the ordered set of		encoded video signal,	construed under 35	including the ordered	generating an encoded
frequency coefficient		the encoded video	U.S.C. § 112(6).	set of frequency	video signal, the
signals		signal including the		coefficient signals	encoded video signal
		ordered set of frequency	Function: generating an		including the ordered
		coefficient signals	encoded video signal,	Structure: variable word	set of frequency
			the encoded video	length encoder 990 (as	coefficient signals
		Structure:	signal including the	shown in Fig. 9 and as	
		(a) variable word length	ordered set of frequency	described at 7:13-37)	Structure: variable word
		encoder 990 (as shown	coefficient signals		length encoder 990 (as
		in			shown in Fig. 9 and as
		Fig. 9 and as described	Structure: variable word		described at 7:13-37)
		at 7:13-16); or	length encoder 990 (as		
			shown in Fig. 9 and as		
		(b) encoder 190 (as	described at 7:13-37)		
		shown in Fig. 1 and as			
		described at col. 2:53-			
		57).			
		consistent with claims 1,	consistent with claims 1,	generating a video	consistent with claims 1,
		7, 13, 19	7, 13, 19	signal using variable	7, 13, 19
				word length encoding	

CLAIM LANGUAGE	AGREED	PLAINTIFF'S	DEFENDANTS'	COURT'S PREVIOUS	COURT'S
(Disputed Terms in	PROPOSED	PRELIMINARY	PRELIMINARY	CONSTRUCTION	CONSTRUCTION
BOLD)	CONSTRUCTION	CONSTRUCTION	CONSTRUCTION		
		generating an encoded	generating an encoded		generating an encoded
		video signal:	video signal:		video signal:
		generating a video	generating a video		generating a video
		signal using variable	signal using a variable		signal using variable
		word length encoding or	word length encoding		word length encoding
1		other entropy encoding			

¹ As corrected by the Certificate of Correction.

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
1. An apparatus for	Structure: input line 10 (as	Function: receiving a	Function: receiving a		Function: receiving a
encoding digital video	shown in Fig. 1 and	digital video input signal	digital video input signal		digital video input signal
signals, comprising:	described at col. 3:61-65)		comprising a succession of		comprising a succession of
		Structure: input line 10 (as	digital representations		digital representations
a means for receiving a		shown in Fig. 1 and	related to picture elements		related to picture elements
digital video input signal		described at col. 3:61-65)	making up at least one		making up at least one
comprising a succession			frame of a video image,		frame of a video image, the
of digital representations			the frame comprising a		frame comprising a
related to picture			plurality of interlaced		plurality of interlaced
elements making up at			fields		fields
least one frame of a video					
image, the frame			Structure: input line 10 (as		Structure: input line 10 (as
comprising a plurality of			shown in Fig. 1 and		shown in Fig. 1 and
interlaced fields			described at col. 3:61-65)		described at col. 3:61-65)
		consistent with claims 1, 2,	consistent with claims 1, 2,		consistent with claims 1, 2,
		13, 15, 23, 24, 26 and 31	13, 15, 23, 24, 26 and 31		13, 15, 23, 24, 26 and 31
		frame:	frame:		frame:
		a complete set of digital			a complete set of digital
		representations for an	a complete picture from a		representations for an
		image	video sequence		image
		interlaced fields:	interlaced fields:		interlaced fields:
		one of the two (or more)	a set of odd horizontal		one of the two (or more)
		parts into which a frame is	scan lines and a set of even		parts into which a frame is
		divided in interlaced	horizontal scan lines that		divided in interlaced
		scanning	together make up a		scanning
		-	complete picture from a		_
			video sequence		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
a means for coding	Function: coding groups of	Function: coding groups of	Function: coding groups of		Function: coding groups of
groups of digital	digital representations	digital representations	digital representations		digital representations
representations related to	related to frames of picture	related to frames of picture	related to frames of picture		related to frames of picture
frames of picture	elements	elements	elements		elements
elements					
		Structure: (a) block	Structure:		Structure: (a) block
		formatting circuit 15A (as	summing element 11 (as		formatting circuit 15A (as
		shown in Fig. 1 and as	shown in Fig. 1A and as		shown in Fig. 1 and as
		described at col. 6:59-66,	described at col. 6 lines 6-		described at col. 6:59-66,
		col. 5:66-6:3 and Fig. 6 as	22) including the digital		col. 5:66-6:3 and Fig. 6 as
		described at col. 19:1-18);	video input signal and		described at col. 19:1-18);
			estimate of the video input		
		(b) discrete cosine	signal input to this		(b) discrete cosine
		transform circuit 16 (as	element, and the signal		transform circuit 16 (as
		shown in Fig. 1 and as	output by this element		shown in Fig. 1 and as
		described at col. 7:5-19);	relating to the error		described at col. 7:5-19);
		and	between the digital video		and
			input signal and the		
		(c) visibility matrix	estimate signal;		(c) visibility matrix
		selector and perceptual			selector and perceptual
		quantizer 19 (as shown in	block formatting circuit		quantizer 19 (as shown in
		Fig. 1 and as described at	15a (as shown in Fig. 1A		Fig. 1 and as described at
		col. 7:27-45, col. 5:66-	and its internal circuitry as		col. 7:27-45, col. 5:66-6:3),
		6:3), or Figure 13 (as	shown in Fig. 6, and as		or Figure 13 (as described
		described at col. 24:61-col.	described at col. 6, line 59		at col. 24:61-col. 25:8).
		25:8).	- col. 7, line 14 and col.		
			19, lines 1-18) including		[The Court requests the
			the coding type signal and		parties to discuss the
			the digital video input		summing element 11 at the

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			signal or the estimate error		hearing.]
			signal input to this		
			element, and the blocks		
			output by this element;		
			discrete cosine transform		
			circuit 16 (as shown in Fig.		
			1A and as described at col.		
			6, line 62 – col. 7, line 19		
			and col. 7, lines 27-30)		
			including the blocks input		
			to this element and the		
			transform coefficients		
			output by this element;		
			visibility matrix selector		
			and perceptual quantizer		
			19 (as shown in Fig. 1A		
			and its internal circuitry as		
			shown in Fig. 13, and as		
			described at col. 7, line 27		
			- col. 8, line 5, col. 9, lines		
			19-22, col. 9, lines 34-37,		
			col. 13, lines 22-25, and		
			col. 24, line 61 - col. 25,		
			line 8) including the		
			transform coefficients,		
			coding type signal, picture		
			type signal, digital input		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			signal, estimate error		
			signal, inter/intra type		
			signal, and fullness signal		
			input to this element, and		
			the quantized transform		
			coefficients and		
			quantization parameter		
			output by this element;		
			scan selector circuit 23 (as		
			shown in Fig. 1A and its		
			internal circuitry as shown		
			in Fig. 14, and as		
			described at col. 8, line 36		
			– col. 9, line 2 and col. 25,		
			lines 9-25) including the		
			quantized transform		
			coefficients and coding		
			type signal input to this		
			element, and the ordered		
			quantized transform		
			coefficients output by this		
			element; and		
			variable word length and		
			fixed word length encoder		
			and multiplexer 24 (as		
			shown in Fig. 1A and as		
			described at col. 8, line 36		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			– col. 9 line 34, col. 12		
			lines 54-56, col. 12, lines		
			60-64, col. 13, lines 26-28,		
			and col. 13, line $63 - col$.		
			14, line 1) including the		
			ordered quantized		
			transform coefficients,		
			block class signal,		
			quantization parameter,		
			picture type signal,		
			differential dc coefficient		
			prediction, variable word		
			length table select signal		
			and differential motion		
			vectors input to this		
			element, and the coded		
			transform coefficients		
			output by this element;		
			including all		
			interconnections between		
			these elements		
		consistent with claims 1,	consistent with claims 1,		consistent with claims 1,
		23, 24, 25 and 31	23, 24, 25 and 31		23, 24, 25 and 31
		groups of digital	groups of digital		groups of digital
		representations:	representations:		representations:
		This term should be given	a number of macroblocks,		This term should be given
		its plain meaning to one of	submacroblocks, and		its plain meaning to one of

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		skill in the art, and therefore does not require construction.	blocks of picture elements, for example, 16x16 macroblocks of picture elements, 16x8 subblocks of picture elements, and		skill in the art, and therefore does not require construction.
			8x8 blocks of picture elements		
a means for coding groups of digital representations related to interlaced fields in the	<u>Function:</u> coding groups of digital representations related to interlaced fields in the frames	<u>Function:</u> coding groups of digital representations related to interlaced fields in the frames	<u>Function:</u> coding groups of digital representations related to interlaced fields in the frames		<u>Function:</u> coding groups of digital representations related to interlaced fields in the frames
		Structure: (a) block formatting circuit 15A (as shown in Fig. 1 and as described at col. 6:59-66, col. 5:66-6:3 and Fig. 6 as described at col. 19:1-18); (b) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-7:19); and	<u>Structure:</u> summing element 11 (as shown in Fig. 1A and as described at col. 6 lines 6-22) including the digital video input signal and estimate of the video input signal input to this element, and the signal output by this element relating to the error between the digital video input signal and the estimate signal;		Structure: (a) block formatting circuit 15A (as shown in Fig. 1 and as described at col. 6:59-66, col. 5:66-6:3 and Fig. 6 as described at col. 19:1-18); (b) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-7:19); and
		(c) visibility matrix selector and perceptual quantizer 19 (as shown in	block formatting circuit 15a (as shown in Fig. 1A and its internal circuitry as		(c) visibility matrix selector and perceptual quantizer 19 (as shown in

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		Fig. 1 and as described at	shown in Fig. 6, and as		Fig. 1 and as described at
		col. 7:27-45, col. 5:66-	described at col. 6, line 59		col. 7:27-45, col. 5:66-
		6:3), or Figure 13 (as	- col. 7, line 14 and col.		6:3), or Figure 13 (as
		described at col. 24:61-col.	19, lines 1-18) including		described at col. 24:61-col.
		25:8).	the coding type signal and		25:8).
			the digital video input		
			signal or the estimate error		[The Court requests the
			signal input to this		parties to discuss the
			element, and the blocks		summing element 11 at the
			output by this element;		hearing.]
			discrete cosine transform		
			circuit 16 (as shown in Fig.		
			1A and as described at col.		
			6, line 62 – col. 7, line 19		
			and col. 7, lines 27-30)		
			including the blocks input		
			to this element and the		
			transform coefficients		
			output by this element;		
			visibility matrix selector		
			10 (as shown in Fig. 1A		
			19 (as snown in Fig. 1A		
			and its internal circuitry as		
			shown in Fig. 15, and as		
			acl & line 5 acl 0 lines		
			$- \cos \theta$, ine 5, coi. 9, lines		
			19-22, col. 9, lines 34-37,		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			col. 13, lines 22-25, and		
			col. 24, line 61 - col. 25,		
			line 8) including the		
			transform coefficients,		
			coding type signal, picture		
			type signal, digital input		
			signal, estimate error		
			signal, inter/intra type		
			signal, and fullness signal		
			input to this element, and		
			the quantized transform		
			coefficients and		
			quantization parameter		
			output by this element;		
			scan selector circuit 23 (as		
			shown in Fig. 1A and its		
			internal circuitry as shown		
			in Fig. 14, and as		
			described at col. 8, line 36		
			$-\operatorname{col.} 9$, line 2 and col. 25,		
			lines 9-25) including the		
			quantized transform		
			coefficients and coding		
			type signal input to this		
			element, and the ordered		
			quantized transform		
			coefficients output by this		
			element; and		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			variable word length and		
			fixed word length encoder		
			and multiplexer 24 (as		
			shown in Fig. 1A and as		
			described at col. 8, line 36		
			– col. 9 line 34, col. 12		
			lines 54-56, col. 12, lines		
			60-64, col. 13, lines 26-28,		
			and col. 13, line $63 - col$.		
			14, line 1) including the		
			ordered quantized		
			transform coefficients,		
			block class signal,		
			quantization parameter,		
			picture type signal,		
			differential dc coefficient		
			prediction, variable word		
			length table select signal		
			and differential motion		
			vectors input to this		
			element, and the coded		
			transform coefficients		
			output by this element;		
			including all		
			interconnections between		
			these elements		
		consistent with claims 1,	consistent with claims 1,		consistent with claims 1,
		23, 24, 25 and 31	23, 24, 25 and 31		23, 24, 25 and 31

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		groups of digital representations: This term should be given its plain meaning to one of skill in the art, and therefore does not require construction.	groups of digital representations: a number of macroblocks, submacroblocks, and blocks of picture elements, for example, 16x16 macroblocks of picture elements, 16x8 subblocks of picture elements, and		groups of digital representations: This term should be given its plain meaning to one of skill in the art, and therefore does not require construction.
a means responsive to the digital video input signal for producing a field frame coding type signal which directs a selected one, but not both, of the frame coding means or the field coding means to code the digital video input signal		<u>Function:</u> producing a field frame coding type signal <u>Structure:</u> (1) block adaptive frame/field coding analyzer 14 (as shown in Fig. 1 and as described at col. 6:22-58, col. 5:66- 6:3); and	8x8 blocks of picture elements <u>Function:</u> producing a field frame coding type signal which directs a selected one, but not both, of the frame coding means or the field coding means to code the digital video input signal <u>Structure:</u> switching		<u>Function:</u> producing a field frame coding type signal <u>Structure:</u> block adaptive frame/field coding analyzer 14 (as shown in Fig. 1 and as described at col. 6:22-58, col. 5:66- 6:3)
		(2) thresholder and comparator 240 (as shown in Fig. 5 and as described at col. 18:57-61).	element 13a (as shown in Fig. 1A and as described at col. 13, lines 19-22) including the inter/intra type coding signal that controls this element; and		[The Court requests the parties to discuss the switching element 13a and threshold and comparator 240.]

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			block adaptive frame/field		
			coding analyzer 14 (as		
			shown in Fig. 1A and its		
			internal circuitry as shown		
			in Fig. 5, and as described		
			at col. 6, lines 22-58 and		
			col. 18, lines 11-68)		
			including the digital video		
			input signal or the estimate		
			error signal input to this		
			element, and the coding		
			type signal output by this		
			element; and including the		
			interconnection between		
			these elements		
		consistent with claims 1,	consistent with claims 1,		consistent with claims 1,
		14, 17, 23 and 26	14, 17, 23 and 26		14, 17, 23 and 26
		coding type:	coding type:		coding type:
			frame coding or interlaced		frame or field coding
			field coding		5
		frame or field coding	6		
2. The encoding apparatus			consistent with claims 2.		consistent with claims 2.
of claim 1, in which the		fields:	23, 24 and 31		23, 24 and 31
fields comprise alternating					
horizontal scan lines of the		The "fields" in this claim	fields:		fields:
frames		refer to "interlaced fields"			
		of claim 1.	a set of odd horizontal		subsets of a frame

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			scan lines and a set of even horizontal scan lines that together make up a complete picture from a		consisting of groups of contiguous picture elements
			video sequence		
		<i>consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31</i>	<i>consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31</i>		<i>consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31</i>
		frame:	frame:		frame:
		a complete set of digital representations for an image	a complete picture from a video sequence		a complete set of digital representations for an image
13. An apparatus for decoding a compressed digital video signal, comprising:	<u>Function:</u> receiving a compressed digital video bit steam	Plaintiff agrees with Defendants' proposed construction.	MPT is collaterally estopped from relitigating this term.	<u>Function</u> : receiving a compressed digital video bit stream	<u>Function</u> : receiving a compressed digital video bit stream
a means for receiving a compressed digital video bit stream; and	<u>Structure:</u> input line 50 (as shown in Fig. 2 and described at col. 14, lines 8-10)	However, plaintiff disputes that it is collaterally estopped.	<u>Function:</u> receiving a compressed digital video bit steam <u>Structure:</u> input line 50 (as shown in Fig. 2 and described at col. 14, lines	<u>Structure</u> : input line 50 (as shown in Fig. 2 and described at col. 14, lines 8-10)	Structure: input line 50 (as shown in Fig. 2 and described at col. 14, lines 8-10)
a means responsive to a	Function: selectively and	Plaintiff disputes that it is	MPT is collaterally	Function: selectively and	Function: selectively and
motion compensation type signal for selectively	adaptively performing motion compensated decoding of frames of the	collaterally estopped from offering a proposed	estopped from relitigating this term.	adaptively performing motion	adaptively performing motion compensated decoding of frames of the
performing motion	compressed digital video	construction for this term.	Structure: circuit 100 (as	frames of the compressed	compressed digital video

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
compensated decoding of	bit stream and fields of the	Structure:	shown in Fig. 2 and its	digital video	bit stream and fields of the
frames of the compressed	compressed video bit	(a) decoder 54 (as shown	internal circuitry as shown	bit stream and fields of the	compressed video bit
video bit stream and	stream	in Fig. 2 and described at	in Figs. 3, 4A, and 4B and	compressed video bit	stream
fields of the compressed		col. 14:10-15, 8:62-68);	as described at col. 15 line	stream	
video bit stream.			22 to col. 18 line 10);		Structure: circuit 100 (as
		(b) block unformatter 72A	circuit 94 (as shown in Fig.	Structure: circuit 100 (as	shown in Fig. 2 and its
		(as described at col. 14:56-	2 and the circuitry within	shown in Fig. 2 and its	internal circuitry as shown
		61, 6:59-66, col. 5:66-6:3)	circuit 94 as shown and	internal circuitry as shown	in Figs. 3, 4A, and 4B and
		and Fig. 7 (as described at	described in Figs. 15, 16A,	in Figs. 3, 4A, and 4B and	as described at col. 15 line
		19:19-38);	and 16B, and the	as described at col. 15 line	22 to col. 18 line 10);
			description of circuit 94	22 to col. 18 line 10);	circuit 94 (as shown in Fig.
		(c) summing element 74	and its internal circuitry set	circuit 94 (as shown in	2 and the circuitry within
		(as described at col. 14:60-	forth in col. 15 lines 11-28	Fig. 2 and the circuitry	circuit 94 as shown and
		68); and	and in col. 25 line 26 to	within circuit 94 as shown	described in Figs. 15, 16A,
			col. 27 line 34); summing	and described in Figs. 15,	and 16B, and the
		(d) estimation circuit 100	element 92; picture stores	16A, and 16B, and the	description of circuit 94
		(as shown in Fig. 2, and as	100C and 100A; circuit 54	description of circuit 94	and its
		described at col. 15:23-	(as shown in Fig. 2, and as	and its	internal circuitry set forth
		42), and	described in Fig. 12 and at	internal circuitry set forth	in col. 15 lines 11-28 and
			col. 14 lines 5-68 and col.	in col. 15 lines 11-28 and	in col. 25 line 26 to col. 27
		i. Fig. 3 (as described at	24 lines 47-60); circuit 80	in col. 25 line 26 to col. 27	line 34); summing element
		col. 15:47-col. 16:27,	(as shown in Fig. 2 and as	line 34); summing element	92; picture stores 100C and
		including previous picture	described at col. 15 lines	92; picture stores 100C	100A; circuit 54 (as shown
		store 100c) or	4-10); and including all	and 100A; circuit 54 (as	in Fig. 2, and as described
			interconnections of these	shown in Fig. 2, and as	in Fig. 12 and at col. 14
		ii. Fig. 4 (as described	elements	described in Fig. 12 and at	lines 5-68 and col. 24 lines
		at col. 16:28-col. 18:10,		col. 14 lines 5-68 and col.	47-60);
		including previous picture		24 lines 47-60);	circuit 80 (as shown in Fig.
		store 100c and next picture		circuit 80 (as shown in	2 and as described at col.

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		store 100a) or		Fig. 2 and as described at	15 lines 4-10); and
				col. 15 lines 4-10); and	including all
		iii. Fig. 3 and Fig. 4 (as		including all	interconnections of these
		described at col. 15:47-		interconnections of these	elements
		18:10, including previous		elements	
		picture store 100c and next			
		picture store 100a)			
		consistent with claims 13,	consistent with claims 13,	a signal that identifies one	consistent with claims 13,
		15 and 31	15 and 31	of two or more available	15 and 31
				modes of	
		motion compensation	motion compensation	motion compensation to	motion compensation
		type signal:	type signal:	be used in motion	type signal:
			MPT is collaterally	compensated	
		a signal that identifies one	estopped from relitigating	decoding of a video signal	a signal that identifies one
		of two or more available	this term.		of two or more available
		modes of motion			modes of
		compensation to be used in	a signal that identifies one		motion compensation to be
		motion compensation	of two or more available		used in motion
			modes of motion		compensated
		However, plaintiff disputes	compensation to be used in		decoding of a video signal
		that it is collaterally	motion compensated		
		estopped.	decoding of a video signal		
		consistent with claims 1, 2,	consistent with claims 1, 2,		consistent with claims 1, 2,
		13, 15, 23, 24, 26 and 31	13, 15, 23, 24, 26 and 31		13, 15, 23, 24, 26 and 31
		e	e		e
		frame:	frame:		frame:
		a complete set of digital	a complete picture from a		a complete set of digital
		representations for an	video sequence		representations for an

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		image			image
	consistent with claims 13, 15 and 23-26	consistent with claims 13, 15 and 23-26	consistent with claims 13, 15 and 23-26	in a manner that selects from among two or more options	consistent with claims 13, 15 and 23-26
	selectively:	selectively:	selectively: MPT is collaterally estopped from relitingting		selectively:
	from among two or more options	from among two or more options	this term.		from among two or more options
		However, plaintiff disputes that it is collaterally estopped.	from among two or more options		
		<i>consistent with claims 13, 26 and 32</i>	adaptively: MPT is collaterally estopped from relitigating	in a manner that changes in response to the motion compensation	consistent with claims 13, 26 and 32
		adaptively:	this term.	type signal	adaptively:
		Plaintiff disputes that it is collaterally estopped from offering a proposed construction for this term.	in a manner that changes in response to the motion compensation type signal		in a manner that changes in response to the motion compensation type signal
		The term should be construed as "capable of changing in response to a condition"			
	motion compensated decoding:	motion compensated decoding:	motion compensated decoding: <i>MPT is collaterally</i>	decoding a compressed video signal using data representing	motion compensated decoding:

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
	decoding a compressed	decoding a compressed	estopped from relitigating	motion vectors that was	decoding a compressed
	video signal using data	video signal using data	this term.	produced and transmitted	video signal using data
	representing motion	representing motion		during the compression	representing
	vectors that was produced	vectors that was produced	decoding a compressed	process, where "decoding"	motion vectors that was
	and transmitted during the	and transmitted during the	video signal using data	means taking a	produced and transmitted
	compression process,	compression process,	representing motion	compressed version of a	during the compression
	where "decoding" means	where "decoding" means	vectors that was produced	video signal and	process, where "decoding"
	taking a compressed	taking a compressed	and t1616ransmitted	reproducing either the	means taking a compressed
	version of a video signal	version of a video signal	during the compression	original video signal or an	version of a video signal
	and reproducing either the	and reproducing either the	process, where "decoding"	estimate of the original	and reproducing either the
	original video signal or an	original video signal or an	means taking a	video signal	original video signal or an
	estimate of the original	estimate of the original	compressed version of a		estimate of the original
	video signal	video signal	video signal and		video signal
			reproducing either the		
		However, plaintiff disputes	original video signal or an		
		that it is collaterally	estimate of the original		
		estopped.	video signal		
	consistent with claims 13,	consistent with claims 13,	consistent with claims 13,	taking a compressed	consistent with claims 13,
	14, 15 and 17	14, 15 and 17	14, 15 and 17	version of a video signal	14, 15 and 17
				and reproducing	
	decoding:	decoding:	decoding:	either the original video	decoding:
			MPT is collaterally	signal or an estimate of	
	taking a compressed	Plaintiff agrees with	estopped from relitigating	the original video signal	taking a compressed
	version of a video signal	Defendants' proposed	this term.		version of a video signal
	and reproducing either the	construction.			and reproducing
	original video signal or an		taking a compressed		either the original video
	estimate of the original	However, plaintiff disputes	version of a video signal		signal or an estimate of the
	video signal	that it is collaterally	and reproducing either the		original video signal
		estopped.	original video signal or an		
			estimate of the original		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			video signal		
		selectively and adaptively	selectively and adaptively	performing motion	selectively and adaptively
		performing motion	performing motion	compensated decoding in	performing motion
		compensated decoding:	compensated decoding:	a manner that	compensated decoding:
			MPT is collaterally	selects from among two or	
		Plaintiff disputes that it is	estopped from relitigating	more options and that	performing motion
		collaterally estopped from	this term.	changes in	compensated decoding in a
		offering a proposed		response to the motion	manner that
		construction for this term.	performing motion compensated decoding in a	compensation type signal	selects from among two or more options and that
		This term should be	manner that selects from		changes in
		construed as "performing	among two or more		response to the motion
		motion compensated	options and that changes in		compensation type signal
		decoding in a manner that	response to the motion		
		selects from among two or	compensation type signal		
		more options and that			
		changes in response to a			
		condition"			

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
14. The apparatus of claim	consistent with claims 13,	consistent with claims 13,	consistent with claims 13,	taking a compressed	consistent with claims 13,
13, in which the decoding	14, 15 and 17	14, 15 and 17	14, 15 and 17	version of a video signal	14, 15 and 17
means comprises:				and reproducing	
	decoding:	decoding:	decoding:	either the original video	decoding:
			MPT is collaterally	signal or an estimate of	
	taking a compressed	taking a compressed	estopped from relitigating	the original video signal	taking a compressed
	version of a video signal	version of a video signal	this term.		version of a video signal
	and reproducing either the	and reproducing either the			and reproducing
	original video signal or an	original video signal or an	taking a compressed		either the original video
	estimate of the original	estimate of the original	version of a video signal		signal or an estimate of the
	video signal	video signal	and reproducing either the		original video signal
			original video signal or an		
		However, plaintiff disputes	estimate of the original		
		that it is collaterally	video signal		
		estopped.	-		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
an adaptive inverse		This element is not	Function: adaptive inverse		Function: adaptive inverse
scanning means		governed by 35 U.S.C. §	scanning responsive to a		scanning responsive to a
responsive to a coding type signal.		112(6).	coding type signal		coding type signal
		If the Court determines	Structure: inverse scan		Structure:
		that this element must be	selector 64 (as shown in		(1) inverse scan selector 64
		construed under 35 U.S.C.	Fig. 2 and its internal		(as shown in Fig. 2 and as
		§ 112(6), the Court should	circuitry as shown in Fig.		described at col. 14:18-23);
		construe the element as	14, and as described at col.		or
		follows:	14 lines 18-23 and col. 25		
			lines 9-25; configured to		(2) Fig. 14 (as described at
		Function: performing	choose between at least		col. 25:9-25).
		inverse scanning	two of the vertical scan		
			pattern, the zigzag scan		
		Structure:	pattern, and the scan		
		(1) inverse scan selector 64	patterns shown in Figs. 1E		
		(as shown in Fig. 2 and as	and 1F) including the DCT		
		described at col. 14:18-	coefficients, inter/intra		
		23); or	type signal and coding		
			type signal input to this		
		(2) Fig. 14 (as described at	element, and the inverse		
		col. 25:9-25).	ordered DCT coefficients		
			output by this element		
		consistent with claims 14,	consistent with claims 14,		consistent with claims 14,
		15, 31 and 33	31 and 33		<i>31 and 33</i>
		adaptive:	adaptive:		adaptive:
		Plaintiff disputes that it is	No construction is		No construction is
		collaterally estopped from	necessary. This term		necessary. This term
CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
---------------------------------------------------	---------------------------------	--------------------------------------------	--------------------------------------------	----------------------------------------------	---------------------------------------------
		offering a proposed	should be given its		should be given its
		construction for this term.	ordinary meaning.		ordinary meaning.
		This term should be			
		construed consistent with			
		the term "adaptively,"			
		defined above, as			
		"capable of changing in			
		response to a condition"			
		coding type:	coding type:		consistent with claims 1, 14, 17, 23 and 26
		consistent with claims 1,	consistent with claims 1,		
		14, 17, 23 and 26	14, 17, 23 and 26		coding type:
		frame or field coding	frame coding or interlaced		frame or field coding
			field coding		C
15. The apparatus of claim	consistent with claims 13,	consistent with claims 13,	consistent with claims 13,	taking a compressed	consistent with claims 13,
13, in which the decoding means comprises:	14, 15 and 17	14, 15 and 17	14, 15 and 17	version of a video signal and reproducing	14, 15 and 17
-	decoding:	decoding:	decoding:	either the original video	decoding:
			MPT is collaterally	signal or an estimate of	
	taking a compressed	taking a compressed	estopped from relitigating	the original video signal	taking a compressed
	version of a video signal	version of a video signal	this term.		version of a video signal
	and reproducing either the	and reproducing either the			and reproducing
	original video signal or an	original video signal or an	taking a compressed		either the original video
	estimate of the original	estimate of the original	version of a video signal		signal or an estimate of the
	video signai	video signai	and reproducing either the		original video signal
		However, plaintiff disputes	estimate of the original		
		that it is collaterally	video signal		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		estopped.			
a means responsive to a	Function: producing an	Plaintiff disputes that it is	MPT is collaterally	Function: producing an	Function: producing an
motion compensation	adaptive motion	collaterally estopped from	estopped from relitigating	adaptive motion	adaptive motion
type signal and	compensated estimate of a	offering a proposed	this term.	compensated estimate of a	compensated estimate of a
selectively responsive to	decoded video signal	construction for this term.		decoded video signal	decoded video signal
frame motion vectors			Structure: circuit 100 (as		
and field motion vectors			shown in Fig. 2 and its	Structure: circuit 100 (as	Structure: circuit 100 (as
for producing an		Structure:	internal circuitry as shown	shown in Fig. 2 and its	shown in Fig. 2 and its
adaptive motion		estimation circuit 100 (as	in Figs. 3, 4A, and 4B and	internal circuitry as shown	internal circuitry as shown
compensated estimate of		shown in Fig. 2 and as	as described at col. 15 line	in Figs. 3, 4A, and 4B and	in Figs. 3, 4A, and 4B and
a decoded video signal;		described at col. 15:23-42)	22 to col. 18 line 10); and	as described at col.	as described at col.
		and	picture stores 100C and	15 line 22 to col. 18 line	15 line 22 to col. 18 line
			100A; including	10); [] and picture stores	10); [] and picture stores
		i. Fig. 3 (as described at	interconnections of these	100C and 100A; including	100C and 100A; including
		col. 15:47-col. 16:27,	elements	interconnections of these	interconnections of these
		including previous picture		elements	elements
		store 100c) or			
		11. Fig. 4 (as described			
		at col. 16:28-col. 18:10,			
		including previous picture			
		store 100c and next picture			
		store 100a), or			
		111. F1g. 3 and F1g. 4 (as			
		described at col. 15:4/-			
		18:10, including previous			
		picture store 100c and next			
		picture store 100a).			

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
	consistent with claims 13, 15 and 23-26	consistent with claims 13, 15 and 23-26	consistent with claims 13, 15 and 23-26	in a manner that selects from among two or more options	consistent with claims 13, 15 and 23-26
	selectively:	selectively:	selectively: MPT is collaterally	, r , , , , , , , , , , , , , , , , , ,	selectively:
	in a manner that selects	in a manner that selects	estopped from relitigating		in a manner that selects
	from among two or more options	from among two or more options	this term.		from among two or more options
			in a manner that selects		
		However, plaintiff disputes	from among two or more		
		that it is collaterally	options		
		estopped.			
	frame motion vectors:	frame motion vectors:	frame motion vectors:	motion vectors for	frame motion vectors:
			MPT is collaterally	producing signals	
	motion vectors for	motion vectors for	estopped from relitigating	representing frames of	motion vectors for
	producing signals	producing signals	this term.	picture elements	producing signals
	representing frames of	representing frames of			representing frames of
	picture elements	picture elements	motion vectors for		picture elements
			producing signals		
		However, plaintiff disputes	representing frames of		
		estopped.	picture elements		
		consistent with claims 1, 2,	consistent with claims 1, 2,		consistent with claims 1, 2,
		13, 15, 23, 24, 26 and 31	13, 15, 23, 24, 26 and 31		13, 15, 23, 24, 26 and 31
		frame:	frame:		frame:
		a complete set of digital	a complete picture from a		a complete set of digital
		representations for an	video sequence		representations for an
		image	-		image

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		consistent with claims 13, 15 and 31	consistent with claims 13, 15 and 31	a signal that identifies one of two or more available modes of	consistent with claims 13, 15 and 31
		motion compensation	motion compensation	motion compensation to	motion compensation
		type signal:	type signal: <i>MPT is collaterally</i>	be used in motion compensated	type signal:
		a signal that identifies one of two or more available modes of motion	estopped from relitigating this term.	decoding of a video signal	a signal that identifies one of two or more available modes of
		compensation to be used in motion compensation	a signal that identifies one of two or more available modes of motion		motion compensation to be used in motion compensated
		However, plaintiff disputes that it is collaterally estopped.	compensation to be used in motion compensated decoding of a video signal		decoding of a video signal
	decoded video signal:	decoded video signal:	decoded video signal: <i>MPT is collaterally</i>	a video signal that has been decoded	decoded video signal:
	a video signal that has been decoded	a video signal that has been decoded.	estopped from relitigating this term.		a video signal that has been decoded
		However, plaintiff disputes that it is collaterally estopped.	a video signal that has been decoded		
		consistent with claims 14, 15, 31 and 33	adaptive: MPT is collaterally estopped from relitigating	capable of changing in response to the motion compensation	consistent with claims 14, 15, 31 and 33
		adaptive:	this term.	type signal	adaptive:
		Plaintiff disputes that it is	capable of changing in		capable of changing in
		collaterally estopped from	response to the motion		response to the motion

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		offering a proposed construction for this term.	compensation type signal		compensation type signal
		This term should be construed consistent with the term "adaptively," defined above, as "capable of changing in response to a condition"			
	field motion vectors: motion vectors for producing signals representing fields of picture elements	field motion vectors: motion vectors for producing signals representing fields of picture elements However, plaintiff disputes that it is collaterally estopped.	field motion vectors: MPT is collaterally estopped from relitigating this term. motion vectors for producing signals representing fields of picture elements	motion vectors for producing signals representing fields of picture elements.	field motion vectors: motion vectors for producing signals representing fields of picture elements
a means responsive to the compressed digital video bit stream for producing a decoded estimate error signal; and,	<u>Function</u> : producing a decoded estimate error signal	Plaintiff disputes that it is collaterally estopped from offering a proposed construction for this term. <u>Function</u> : producing a decoded estimate error signal <u>Structure</u> : (a) decoder and	MPT is collaterally estopped from relitigating this term.Function: producing a decoded estimate error signalStructure: (as shown in Figs. 2, 7, 12, 13, and 14 and as described at col.14	<u>Function</u> : producing a decoded estimate error signal <u>Structure</u> : (as shown in Figs. 2, 7,12, 13, and 14 and as described at col.14 lines 5-68, at col. 19 lines 19-38, and at col. 24 line 47 to col. 25 line 25): circuit 54; circuit 64	Function: producing a decoded estimate error signalStructure: (as shown in Figs. 2, 7,12, 13, and 14 and as described at col.14 lines 5-68, at col. 19 lines 19-38, and at col. 24 line 47 to col. 25 line 25): circuit 54; circuit 64

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		 demultiplexer 54 (as shown in Fig. 2 and as described at col.14:10-18, col. 8:62-9:2, col. 9:14-22); (b) inverse scan selector 64 (as shown in Fig. 2 and as described at col. 14:18-23); (c) visibility matrix and dequantizer 66 (as shown in Fig. 2 and as described at col. 14:23-31, col. 7:27-45, col. 5:66- 6:3); (d) inverse discrete cosine transform circuit 72 (as shown in Fig. 2 and as described at col. 14:45-50); and (e) block unformatting circuit 72A (as shown in Fig. 2 and as described at col. 14:56-61, col. 5:66-6:3, and col. 6:59-66, and Fig. 7 as described at col. 19:19-38). 	lines 5-68, at col. 19 lines 19-38, and at col. 24 line 47 to col. 25 line 25): circuit 54; circuit 64 (see Fig. 14 for internal circuitry); circuit 66 (see Fig. 13 for internal circuit 72; and circuit 72A (see Fig. 7 for internal circuitry); and all interconnections between these elements	(see Fig. 14 for internal circuitry); circuit 66 (see Fig. 13 for internal circuitry); circuit 72; and circuit 72A (see Fig. 7 for internal circuitry); and all interconnections between these elements	(see Fig. 14 for internal circuitry); circuit 66 (see Fig. 13 for internal circuitry); circuit 72; and circuit 72A (see Fig. 7 for internal circuitry); and all interconnections between these elements

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
a means responsive to the	Function: producing a	Plaintiff disputes that it is	MPT is collaterally	Function: producing a	Function: producing a
adaptive motion	decoded video signal	collaterally estopped from	estopped from relitigating	decoded video signal	decoded video signal
compensated estimate		offering a proposed	this term.		
and the estimate error		construction for this term.		Structure: (as shown in	Structure: (as shown in Fig.
signal for producing a			<u>Function</u> : producing a	Fig. 2 and as described at	2 and as described at col.
decoded video signal.		<u>Function</u> : producing a	decoded video signal	col. 14 lines 50-68):	14 lines 50-68): summing
		decoded video signal		summing element 74 and	element 74 and including
			Structure: (as shown in	including all inputs and	all inputs and outputs of
		Structure: summing	Fig. 2 and as described at	outputs of this element	this element
		element 74 (as shown in	col. 14 lines 50-68):		
		Fig. 2 and as described at	summing element 74 and		
		col. 14:50-68)	including all inputs and		
			outputs of this element		
17. The apparatus of claim	consistent with claims 13,	consistent with claims 13,	consistent with claims 13,	taking a compressed	consistent with claims 13,
13, in which the decoding	14, 15 and 17	14, 15 and 17	14, 15 and 17	version of a video signal	14, 15 and 17
means comprises:				and reproducing	
	decoding:	decoding:	decoding:	either the original video	decoding:
			MPT is collaterally	signal or an estimate of	
	taking a compressed	taking a compressed	estopped from relitigating	the original video signal	taking a compressed
	version of a video signal	version of a video signal	this term.		version of a video signal
	and reproducing either the	and reproducing either the			and reproducing
	original video signal or an	original video signal or an	taking a compressed		either the original video
	estimate of the original	estimate of the original	version of a video signal		signal or an estimate of the
	video signal	video signal	and reproducing either the		original video signal
			original video signal or an		
		However, plaintiff disputes	estimate of the original		
		that it is collaterally	video signal		
		estopped.			

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
a means for receiving a compressed digital video signal comprising at least one DC coefficient representation related to the video signal;		<u>Function</u> : receiving a compressed digital video signal <u>Structure</u> : input line 50 (as shown in Fig. 2 and described at col. 14:8-10)	<u>Function:</u> receiving a compressed digital video signal comprising at least one DC coefficient representation related to the video signal <u>Structure:</u> variable word length decoder and demultiplexer 54 (as shown in Fig. 2 and as described at col. 14, lines 10-18, and the inverse of the operation of the encoder and multiplexer 24, as described at col. 8, line 36 – col. 9 line 34, col. 12 lines 54-56, col. 12, lines 60-64, col. 13, lines 26-28, col. 13, line 63 – col. 14, line 1) including the bit stream input to this element		<u>Function:</u> receiving a compressed digital video signal comprising at least one DC coefficient representation related to the video signal <u>Structure</u> : input line 50 (as shown in Fig. 2 and described at col. 14:8-10) variable word length decoder and demultiplexer 54 (as shown in Fig. 2 and as described at col. 14, lines 10-18, and the inverse of the operation of the encoder and multiplexer 24, as described at col. 8, line 36 – col. 9 line 34, col. 12 lines 54-56, col. 12, lines 60-64, col. 13, lines 26-28, col. 13, line 63 – col. 14, line 1) including
					the bit stream input to this element
a means for producing an estimated DC coefficient in response to a coding		Function: producing an estimated DC coefficient	<u>Function</u> : producing an estimated DC coefficient in response to a coding		<u>Function</u> : producing an estimated DC coefficient in response to a coding type

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
type signal; and,		Structure: prediction circuit 60 (as shown in Fig. 2 and as described at col. 14:37-40, col. 5:66-6:3)	type signal <u>Structure:</u> intra DC coefficient prediction circuit 60 (as shown in Fig. 2, as described at col. 14, lines 36-39, and configured to operate in accordance with Fig. 8 (as described at col. 19, line 39 - col. 20, line 64) and Fig. 9 (as described at col. 20, line 65 – col. 21, line 49)) including the intra DC coefficient signal and coding type signal input to this element, and the intra DC coefficient prediction signal output by this element		signal <u>Structure:</u> prediction circuit 60 (as shown in Fig. 2 and as described at col. 14:37- 40, col. 5:66-6:3), configured to operate in accordance with Fig. 8 (as described at col. 19, line 39 - col. 20, line 64) [The Court requests the parties to discuss Figure 9, input signals, and output signals at the hearing.]
a means for producing a decoded DC coefficient signal in response to the DC coefficient representation and the estimated DC coefficient.		<u>Function</u> : producing a decoded DC coefficient signal <u>Structure</u> : summing element 58 (as shown in Fig. 2, and as described at col. 14:32-40)	<u>Function</u> : producing a decoded DC coefficient signal in response to the DC coefficient representation and the estimated DC coefficient <u>Structure</u> : summing element 58 (as shown in Fig. 2 and as described at		<u>Function</u> : producing a decoded DC coefficient signal in response to the DC coefficient representation and the estimated DC coefficient <u>Structure</u> : summing element 58 (as shown in Fig. 2, and as

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			col. 14, lines 31-39) including the differential		described at col. 14:32-40)
			DC coefficient signal and		
			intra DC coefficient		
			prediction signal input to		
			this element, and the intra		
			DC transform coefficient		
			signal output by this		
		consistent with claims 1	consistent with claims 1		consistent with claims 1
		14 17 23 and 26	14 17 23 and 26		14 17 23 and 26
		1 1, 17, 25 unu 20	11, 17, 25 ana 20		17, 17, 20 and 20
		coding type:	coding type:		coding type:
		frame or field coding	frame coding or interlaced field coding		frame or field coding
23. An apparatus for	Structure: input line 10 (as	Function: receiving a	Function: receiving a		Function: receiving a
encoding digital video	shown in Fig. 1 and	digital video input signal	digital video input signal		digital video input signal
signals, comprising:	described at col. 3:61-65)	Star 10 (comprising a succession of		comprising a succession of
a maana fan raaaiying a		Structure: input line 10 (as	digital representations of		digital representations of
digital video input signal		described at col 3.61-65)	up at least one video		at least one video frame
comprising a succession			frame, the frame		the frame comprising a
of digital representations			comprising a plurality of		plurality of fields
of picture elements			fields		· ·
making up at least one					Structure: input line 10 (as
video frame, the frame			Structure: input line 10 (as		shown in Fig. 1 and

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
comprising a plurality of fields;			shown in Fig. 1 and described at col. 3:61-65)		described at col. 3:61-65)
		consistent with claims 23, 24 and 31	consistent with claims 2, 23, 24 and 31		consistent with claims 23, 24 and 31
		fields:	fields:		fields:
		subsets of a frame consisting of groups of contiguous picture elements	a set of odd horizontal scan lines and a set of even horizontal scan lines that together make up a complete picture from a video sequence		subsets of a frame consisting of groups of contiguous picture elements
		consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31	consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31		consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31
		frame:	frame:		frame:
		a complete set of digital representations for an image	a complete picture from a video sequence		a complete set of digital representations for an image
a means for selectively encoding groups of digital representations in the input signal relating to one of frames and fields;	<u>Function</u> : selectively encoding groups of digital representations in the input signal relating to one of frames and fields	<u>Function</u> : selectively encoding groups of digital representations in the input signal relating to one of frames and fields <u>Structure</u> :	<u>Function</u> : selectively encoding groups of digital representations in the input signal relating to one of frames and fields <u>Structure</u> :		<u>Function</u> : selectively encoding groups of digital representations in the input signal relating to one of frames and fields <u>Structure</u> :
		(a) summing element 11 (as shown in Fig. 1 and as	summing element 11 (as shown in Fig. 1A and as		(a) summing element 11 (as shown in Fig. 1 and as

described at col. 6:6-22); described at col. 6:6-22); 2) including the digital video input signal and video input signal and video input signal and video input signal and signal input to this signal input to this element, and the signal col. 19:1-18); between the digital video input signal and the element, and the signal output by this element relating to the error between the digital video input signal and the error the signal relating to the error between the digital video input signal and the estimate signal;(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:19); and(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:19); and(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 24:61-col. 25:8).(d) visibility matrix selector and perceptual the coding type signal and the coding type signal a	CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
22) including the digital video input signal and estimate of the video input signal input to this estimate of the video input between the digital video input signal and the estimate signal; 			described at col. 6:6-22);	described at col. 6 lines 6 -		described at col. 6:6-22);
(b) block formatting circuit(b) block formatting circuit15A (as shown in Fig. 1and as described at col.6:59-66, col. 5:66-6:3),and Fig. 6 (as described atand Fig. 6 (as described atcol. 19:1-18);(c) discrete cosinetransform circuit 16 (asshown in Fig. 1 and asdescribed at col. 7:5-col.7:19); and(d) visibility matrixselector and perceptualquantizer 19 (as shown inFig. 13 (as described atcol. 7:27-45, col. 5:66-6:3)or Fig. 13 (as described atcol. 24:61-col. 25:8).or Fig. 13 (as described atcol. 24:61-col. 25:8).col. 24:61-col. 25:8).col. 24:61-col. 25:8).col. 61-col. 25:8).col. 61-col. 25:8).col. 61-col. 25:8).col. 61-col. 25:8).col. 7-10col. 7-10col. 7-10col. 7-10col. 7-10col. 7-10col. 7-10col. 7-10col. 7-10col. 24:61-col. 25:8				22) including the digital		
15A (as shown in Fig. 1 and as described at col. 6:59-66, col. 5:66-6:3), and Fig. 6 (as described at col. 19:1-18);15A (as shown in Fig. 1 and as described at col. 6:59-66, col. 5:66-6:3), element, and the signal output by this element relating to the error between the digital video input signal and the estimate signal;15A (as shown in Fig. 1 and as described at col. 6:59-66, col. 5:66-6:3), dot put by this element relating to the error between the digital video input signal and the estimate signal;15A (as shown in Fig. 1 and as described at col. (c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 7:19); and15A (as shown in Fig. 1 and as described at col. to discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 6. line 59 -col. 7, 10e 14 and col. 19, lines 1-18) including the digital video input signal input to this element, and the blocks output by this element relation circuit 16 (as shown in Fig. 13 (as described at col. 24:61-col. 25:8).15A (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).15A (as shown in Fig. 1 and as described at col. 24:61-col. 25:8).			(b) block formatting circuit	video input signal and		(b) block formatting circuit
and as described at col. 6:59-66, col. 5:66-6:3), and Fig. 6 (as described at col. 19:1-18);and as described at col. 6:59-66, col. 5:66-6:3), and and Fig. 6 (as described at col. 19:1-18);(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 7:19); and(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 15:6 (as shown in Fig. 1 and as described at col. 7:5-col. 15:6 (as shown in Fig. 1 and as described at col. 7:5-col. 15:6 (as shown in Fig. 1 and as described at col. 7:5-col. 15:6 (as shown in Fig. 1 and as described at col. 7:5-col. 19: and and its internal circuitry as shown in Fig. 6 (as described at col. 7:27-45; col. 5:66-6:3) or Fig. 13 (as described at col. 7:4:61-col. 25:8).(d) visibility matrix selector and perceptual quantizer 19 (as shown in 19, lines 1-18) including the coding type signal and the cing type signal and the digital video input signal input to this element, and the blocks output by this element;(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45; col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).(d) visibility matrix signal input to this element, and the blocks output by this element;(c) 2:27-45; col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).			15A (as shown in Fig. 1	estimate of the video input		15A (as shown in Fig. 1
6:59-66, col. 5:66-6:3), and and Fig. 6 (as described at col. 19:1-18);element, and the signal output by this element relating to the error between the digital video input signal and the estimate signal;6:59-66, col. 5:66-6:3), and Fig. 6 (as described at col. (c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 7:19); and6:59-66, col. 5:66-6:3), and Fig. 6 (as described at col. (c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 15 (as shown in Fig. 1A and its internal circuity as shown in Fig. 6, and as described at col. 6 line 59 -col. 7, line 14 and col. 19, lines 1-18) including the coding type signal and the coding type signal and the coding type signal and the coding type signal and the docinput signal or the estimate error signal input to this element, and the blocks output by this element;6:59-66, col. 5:66-6:3), and Fig. 1 and as described at col. 7:19; and7:19; and and its internal circuity as shown in Fig. 13 (as described at col. 24:61-col. 25:8).9:000000000000000000000000000000000000			and as described at col.	signal input to this		and as described at col.
and Fig. 6 (as described at col. 19:1-18);output by this element relating to the error between the digital video input signal and the estimate signal;Fig. 6 (as described at col. 19:1-18);(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 7:19); and(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 15a (as shown in Fig. 1A and its internal circuitry as described at col. 6, line 59 - col. 7, line 14 and col. 19, lines 1-18) including Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).(d) visibility matrix selector and perceptual quantizer 19 (as shown in 19, lines 1-18) including the digital video input signal or the estimate error signal input to this element, and the blocks output by this element;Fig. 6 (as described at col. 19:1-18);(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 24:61-col. 25:8).Ibox formatting circuit ta col. 6, line 59 - col. 7, line 14 and col. 19, lines 1-18) including the digital video input signal or the estimate error signal input to this element;(d) visibility matrix col. 24:61-col. 25:8).			6:59-66, col. 5:66-6:3),	element, and the signal		6:59-66, col. 5:66-6:3), and
col. 19:1-18);relating to the error between the digital video input signal and the estimate signal;19:1-18);(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 7:19); and(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 15a (as shown in Fig. 1A and its internal circuitry as selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).(d) visibility matrix selector and perceptual te coding type signal and the digital video input signal input to this element;(d) visibility matrix col. 24:61-col. 25:8).(d) visibility matrix selector and perceptual te digital video input signal input to this element;(d) visibility matrix selector and perceptual col. 7:27-45, col. 5:66-6:3) the digital video input signal input to this element;(d) visibility matrix signal or the estimate error signal input to this element;(d) visibility matrix signal or the signal or t			and Fig. 6 (as described at	output by this element		Fig. 6 (as described at col.
between the digital video input signal and the estimate signal;(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 7:19); and(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 15a (as shown in Fig. 1A and its internal circuitry as shown in Fig. 6, and as celcor and perceptual quantizer 19 (as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).between the digital video input signal and the estimate esignal; block formating circuit 15a (as shown in Fig. 6, and as described at col. 6, line 59 e-col. 7, line 14 and col. quantizer 19 (as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).(c) input signal and the coding type signal and the digital video input signal input to this element; discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col. col. 24:61-col. 25:8).(c) input signal and the element; discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col.			col. 19:1-18);	relating to the error		19:1-18);
(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 7:19); andinput signal and the estimate signal;(c) discrete cosine transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 15a (as shown in Fig. 1A and its internal circuitry as shown in Fig. 1 and as described at col. 6, line 59 - col. 7, line 14 and col. 19, lines 1-18) including the digital video input signal and the digital video input signal or the stimate error signal input to this element;(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).intend circuity as selector and the blocks output by this element;(c) discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col. 7:27-45, col. 5:66-6:3)or Fig. 13 (as described at col. 24:61-col. 25:8).col. 24:61-col. 25:8).col. 24:61-col. 25:8).col. 24:61-col. 25:8).				between the digital video		
transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 7:19); andestimate signal;transform circuit 16 (as shown in Fig. 1 and as described at col. 7:5-col. 7:19); and(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).block formatting circuit 15a (as shown in Fig. 1A and its internal circuitry as shown in Fig. 1 and as described at col. 7,127-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).cell (as			(c) discrete cosine	input signal and the		(c) discrete cosine
shown in Fig. 1 and as described at col. 7:5-col. 7:19); andshown in Fig. 1 and as described at col. 7:5-col. 15a (as shown in Fig. 1A and its internal circuitry as shown in Fig. 6, and as described at col. 6, line 59 - col. 7, line 14 and col. 19, lines 1-18) including the digital video input signal or the estimate error signal input to this element, and the blocks output by this element;shown in Fig. 1 (24:61-col. 25:8).shown in Fig. 1 (24:61-col. 25:8).			transform circuit 16 (as	estimate signal;		transform circuit 16 (as
described at col. 7:5-col. 7:19); andblock formatting circuit 15a (as shown in Fig. 1A and its internal circuitry as shown in Fig. 6, and as quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:33) or Fig. 13 (as described at col. 24:61-col. 25:8).block formatting circuit 15a (as shown in Fig. 6, and as described at col. 6, line 59 - col. 7, line 14 and col. 19, lines 1-18) including the coding type signal and to Fig. 13 (as described at col. 24:61-col. 25:8).described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).describe at col. 24:61-col. 25:8).describe at col. 24:61-col. 25:8).			shown in Fig. 1 and as			shown in Fig. 1 and as
7:19); and15a (as shown in Fig. 1A and its internal circuitry as shown in Fig. 6, and as described at col. 6, line 59 - col. 7, line 14 and col.7:19); and(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).15a (as shown in Fig. 1A and its internal circuitry as shown in Fig. 6, and as described at col. 6, line 59 - col. 7, line 14 and col.7:19); and19, lines 1-18) including the coding type signal and trol 24:61-col. 25:8) col. 7, line 14 and col.19, lines 1-18) including13 (as described at col. 24:61-col. 25:8) sol. 7:27-45, col. 5:66-6:3) the digital video input signal input to this element;or Fig. 13 (as described at col. 24:61-col. 25:8).or Fig. 13 (as described at col. 24:61-col. 25:8).discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col.discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col.either 10, line 10, l			described at col. 7:5-col.	block formatting circuit		described at col. 7:5-col.
(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).(d) visibility matrix selector and perceptual described at col. 6, line 59 - col. 7, line 14 and col. 19, lines 1-18) including the digital video input signal input to this element;(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).(d) visibility matrix selector and perceptual quantizer 19 (as shown in 19, lines 1-18) including the digital video input signal input to this element;discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col.discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col.			7:19); and	15a (as shown in Fig. 1A		7:19); and
(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).shown in Fig. 6, and as described at col. 6, line 59 - col. 7, line 14 and col. 19, lines 1-18) including the oding type signal and the coding type signal and the digital video input signal input to this element, and the blocks output by this element;(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).(d) visibility matrix selector and perceptual quantizer 19 (as shown in 19, lines 1-18) including the digital video input signal input to this element, and the blocks output by this element;(d) visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).				and its internal circuitry as		
selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).			(d) visibility matrix	shown in Fig. 6, and as		(d) visibility matrix
quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8) col. 7, line 14 and col. 19, lines 1-18) including the coding type signal and the digital video input signal input to this element, and the blocks output by this element;quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8) col. 7, line 14 and col. 19, lines 1-18) including 			selector and perceptual	described at col. 6, line 59		selector and perceptual
Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).19, lines 1-18) including the coding type signal and the digital video input signal or the estimate error signal input to this element, and the blocks output by this element;Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col.fig. 1 and as described at col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).			quantizer 19 (as shown in	- col. 7, line 14 and col.		quantizer 19 (as shown in
col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).the coding type signal and the digital video input signal or the estimate error signal input to this element, and the blocks output by this element;col. 7:27-45, col. 5:66-6:3) or Fig. 13 (as described at col. 24:61-col. 25:8).discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col. f lame for an as described at col.col. 61			Fig. 1 and as described at	19, lines 1-18) including		Fig. 1 and as described at
or Fig. 13 (as described at col. 24:61-col. 25:8).			col. 7:27-45, col. 5:66-6:3)	the coding type signal and		col. 7:27-45, col. 5:66-6:3)
col. 24:61-col. 25:8). signal or the estimate error signal input to this element, and the blocks output by this element; discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col. 6 line 62 col. 7 line 10			or Fig. 13 (as described at	the digital video input		or Fig. 13 (as described at
discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col.			col. 24:61-col. 25:8).	signal or the estimate error		col. 24:61-col. 25:8).
element, and the blocks output by this element; discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col. 6 line 62 col. 7 line 10				signal input to this		
discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col. 6 line 62 - col. 7 line 10				element, and the blocks		
discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col.				output by this element;		
circuit 16 (as shown in Fig. 1A and as described at col.				discrete cosine transform		
1A and as described at col.				circuit 16 (as shown in Fig		
$\begin{bmatrix} 1 \text{ A and as uccentred at con} \\ 6 \text{ line } 62 \text{ cond} 7 \text{ line } 10 \end{bmatrix}$				1 A and as described at col		
				$6 \lim_{n \to \infty} 62 - col_{n-1} 7 \lim_{n \to \infty} 10$		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			and col. 7, lines 27-30)		
			including the blocks input		
			to this element and the		
			output by this element.		
			output by this chemicht,		
			visibility matrix selector		
			and perceptual quantizer		
			19 (as shown in Fig. 1A		
			and its internal circuitry as		
			shown in Fig. 13, and as		
			described at col. 7, line 27		
			- col. 8, line 5, col. 9, lines		
			19-22, col. 9, lines 34-37,		
			col. 15, line $52-25$, and col. 24 line $51-col. 25$		
			line 8) including the 23 ,		
			transform coefficients		
			coding type signal, picture		
			type signal, digital input		
			signal, estimate error		
			signal, inter/intra type		
			signal, and fullness signal		
			input to this element, and		
			the quantized transform		
			coefficients and		
			quantization parameter		
			output by this element;		
			scan selector circuit 23 (as		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			shown in Fig. 1A and its		
			internal circuitry as shown		
			in Fig. 14, and as		
			described at col. 8, line 36		
			$-\operatorname{col.} 9$, line 2 and col. 25,		
			lines 9-25) including the		
			quantized transform		
			type signal input to this		
			element and the ordered		
			quantized transform		
			coefficients output by this		
			element; and		
			variable word length and		
			fixed word length encoder		
			and multiplexer 24 (as		
			shown in Fig. 1A and as		
			described at col. 8, line 36		
			– col. 9 line 34, col. 12		
			lines 54-56, col. 12, lines		
			60-64, col. 13, lines 26-28,		
			and col. 13, line $63 - col.$		
			14, line 1) including the		
			transform coefficients		
			block class signal		
			quantization parameter		
			picture type signal.		
			differential dc coefficient		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			prediction, variable word		
			and differential motion		
			vectors input to this		
			element, and the coded		
			transform coefficients		
			output by this element;		
			including all		
			interconnections between		
			these elements		
		consistent with claims 23,	consistent with claims 2,		consistent with claims 23 ,
		24 ana 31	23, 24 ana 31		24 ana 31
		fields:	fields:		fields:
		subsets of a frame	a set of odd horizontal		subsets of a frame
		consisting of groups of	scan lines and a set of even		consisting of groups of
		contiguous picture	horizontal scan lines that		contiguous picture
		elements	together make up a		elements
			complete picture from a		
		annistant with alaims 1	video sequence		annistant with alaims 1
		23 24 25 and 31	23 24 25 and 31		$\begin{array}{c} \text{consistent with claims 1,} \\ 23 \ 24 \ 25 \ \text{and 31} \end{array}$
		23, 24, 25 and 51	23, 24, 25 and 51		23, 24, 25 unu 51
		groups of digital	groups of digital		groups of digital
		representations:	representations:		representations:
		This term should be given	a number of macroblocks,		This term should be given
		its plain meaning to one of	submacroblocks, and		its plain meaning to one of
		skill in the art, and	blocks of picture elements,		skill in the art, and

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		therefore does not require	for example, 16x16		therefore does not require
		construction.	macroblocks of picture		construction.
			elements, 16x8 subblocks		
			of picture elements, and		
			8x8 blocks of picture		
			elements		
	consistent with claims 13,	consistent with claims 13,	consistent with claims 13,	in a manner that selects	consistent with claims 13,
	15 and 23-26	15 and 23-26	15 and 23-26	from among two or more	15 and 23-26
				options	
	selectively:	selectively:	selectively:		selectively:
			MPT is collaterally		
	in a manner that selects	in a manner that selects	estopped from relitigating		in a manner that selects
	from among two or more	from among two or more	this term.		from among two or more
	options	options			options
			in a manner that selects		
		However, plaintiff disputes	from among two or more		
		that it is collaterally	options		
		estopped.	consistent with plaims 1.2		consistent with plaims 1.2
		$\begin{array}{c} \text{consistent with claims 1, 2,} \\ 12 15 22 24 26 \text{ and } 21 \end{array}$	$\begin{array}{c} \text{consistent with claims 1, 2,} \\ 12 15 22 24 26 \text{ and } 21 \end{array}$		$\begin{array}{c} \text{consistent with claims 1, 2,} \\ 12 15 22 24 26 \text{ and } 21 \end{array}$
		15, 15, 25, 24, 20 ana 51	13, 13, 23, 24, 20 ana 31		13, 13, 23, 24, 20 unu 31
		frame:	frame:		frame:
		a complete set of digital	a complete picture from a		a complete set of digital
		representations for an	video sequence		representations for an
		image			image
a means responsive to the		Function: ascertain a	Function: ascertain a		Function: ascertain a
video input signal prior		predetermined	predetermined		predetermined
to encoding to ascertain a		characteristic present in	characteristic present in		characteristic present in the
predetermined		the input signal	the input signal prior to		input signal prior to

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
characteristic present in		<u>Structure</u> :	encoding for producing a		encoding for producing a
the input signal prior to			field/frame encoding type		field/frame encoding type
encoding for producing a		(1) block adaptive	signal which directs the		signal which directs the
field/frame encoding type		frame/field coding	encoding means to encode		encoding means to encode
signal which directs the		analyzer 14 (as shown in	a selected one, but not		a selected one, but not
encoding means to		Fig. 1 and as described at	both, of the groups of		both, of the groups of
encode a selected one,		col. 6:22-58, col. 5:66-	digital representations		digital representations
but not both, of the		6:3); and	relating to frames and		relating to frames and
groups of digital			fields in the input signal		fields in the input signal
representations relating		(2) submacro block			
to frames and fields in		vertical correlation	Structure:		(1) block adaptive
the input signal.		computer 244, submacro	switching element 13a (as		frame/field coding analyzer
		block vertical correlation	snown in Fig. 1A and as		14 (as shown in Fig. 1 and
		computer 252, and macro	described at col. 13, lines		as described at col. $6:22$ -
		block vertical correlation	19-22) including the		58, col. 5:00- 6:5); and
		Computer 256 (as shown in	signal that controls this		(2) submaana blaak wantiaal
		Fig. 5 and as described at a_{2}	signal that controls this		(2) submacro block vertical
		col. 18:14-20, 18:27-31).	element, and		submarra block vortical
			block adaptive frame/field		submacro block vertical
			coding analyzer 14 (as		and macro block vertical
			shown in Fig. 1A and its		correlation computer 236
			internal circuitry as shown		(as shown in Fig. 5 and as
			in Fig. 5 and as described		described at col 18:14-20
			at col. 6. lines 22-58 and		18:27-51).
			col. 18, lines 11-68)		
			including the video input		
			signals or the estimate		
			error signal input to this		
			element, and the coding		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			type signal output by this		
			interconnection between		
			these elements		
		field/frame coding type:	field/frame coding type:		field/frame coding type:
		consistent with claims 1,	consistent with claims 1,		consistent with claims 1,
		14, 17, 23 and 26	14, 17, 23 and 26		14, 17, 23 and 26
		frame or field coding	frame coding or interlaced		frame or field coding
		frame of field county	field coding		frame of field county
		consistent with claims 1,	consistent with claims 1,		consistent with claims 1,
		23, 24, 25 and 31	23, 24, 25 and 31		23, 24, 25 and 31
		anoung of digital	anorma of digital		anound of digital
		groups of digital representations:	groups of digital representations:		groups of digital representations:
		representations.	representations.		representations.
		This term should be given	a number of macroblocks,		This term should be given
		its plain meaning to one of	submacroblocks, and		its plain meaning to one of
		skill in the art, and	blocks of picture elements,		skill in the art, and
		therefore does not require	for example, 16x16		therefore does not require
		construction.	macroblocks of picture		construction.
			of picture elements, and		
			8x8 blocks of picture		
			elements		
24. The apparatus of claim	Function: selectively	Function: selectively	Function: selectively		Function: selectively
23, in which the means for	transforming first groups	transforming first groups	transforming first groups		transforming first groups of
encoding comprises a	of digital representations	of digital representations	of digital representations		digital representations
means for selectively	relating to one of frames of	relating to one of frames of	relating to one of frames of		relating to one of frames of

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
transforming first groups	picture elements and fields	picture elements and fields	picture elements and fields		picture elements and fields
of digital representations	of picture elements into	of picture elements into	of picture elements into		of picture elements into
relating to one of frames	second groups of digital	second groups of digital	second groups of digital		second groups of digital
of picture elements and	representations relating to	representations relating to	representations relating to		representations relating to
fields of picture elements	one of frames of picture	one of frames of picture	one of frames of picture		one of frames of picture
into second groups of	elements and fields of	elements and fields of	elements and fields of		elements and fields of
digital representations	picture elements	picture element	picture elements		picture elements
relating to one of frames					
of picture elements and		Structure:	Structure:		Structure:
fields of picture elements.		(a) block formatting circuit	switching element 13a (as		(a) block formatting circuit
		15A (as shown in Fig. 1	shown in Fig. 1A and as		15A (as shown in Fig. 1
		and as described at col.	described at col. 13, lines		and as described at col.
		6:59-66, col. 5:66-6:3) and	19-22) including the		6:59-66, col. 5:66-6:3) and
		Fig. 6 (as described at col.	inter/intra type coding		Fig. 6 (as described at col.
		19:1-18); and	signal that controls this		19:1-18); and
			element;		
		(c) discrete cosine			(b) discrete cosine
		transform circuit 16 (as	block adaptive frame/field		transform circuit 16 (as
		shown in Fig. 1 and as	coding analyzer 14 (as		shown in Fig. 1 and as
		described at col. 7:5-col.	shown in Fig. 1A and its		described at col. 7:5-col.
		7:19).	internal circuitry as shown		7:19).
			in Fig. 5, and as described		
			at col. 6, lines 22 – 58, col.		
			7, lines 38-40, and col. 18,		
			lines 11-68) including the		
			digital video input signal		
			or the estimate error signal		
			input to this element, and		
			the coding type signal		
			output by this element;		

CLAIM TERM AGREED PROPOSEI CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		block formatting circuit		
		15a (as shown in Fig. 1A		
		and its internal circuitry as		
		shown in Fig. 6, and as		
		described at col. 6, line 59		
		- col. 7, line 14 and col.		
		19, lines 1-18), including		
		the coding type signal and		
		the digital video input		
		signal or the estimate error		
		signal input to this		
		element, and the blocks		
		output by this element; and		
		1		
		discrete cosine transform		
		circuit 16 (as shown in Fig.		
		IA and as described at col.		
		6, line $62 - col.$ 7, line 19		
		and col. 7, lines 27-50),		
		to this element and the		
		to this element and the		
		output by this alomant:		
		including all		
		interconnections between		
		these elements		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31	consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31		consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31
		frame:	frame:		frame:
		a complete set of digital representations for an image	a complete picture from a video sequence		a complete set of digital representations for an image
		consistent with claims 23, 24 and 31	consistent with claims 2, 23, 24 and 31		consistent with claims 23, 24 and 31
		fields:	fields:		fields:
		subsets of a frame consisting of groups of contiguous picture elements	a set of odd horizontal scan lines and a set of even horizontal scan lines that together make up a complete picture from a video sequence		subsets of a frame consisting of groups of contiguous picture elements
		consistent with claims 1, 23, 24, 25 and 31	consistent with claims 1, 23, 24, 25 and 31		consistent with claims 1, 23, 24, 25 and 31
		groups of digital representations:	groups of digital representations:		groups of digital representations:
		This term should be given its plain meaning to one of skill in the art, and therefore does not require	a number of macroblocks, submacroblocks, and blocks of picture elements, for example, 16x16		This term should be given its plain meaning to one of skill in the art, and therefore does not require

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		construction.	macroblocks of picture elements, 16x8 subblocks of picture elements, and		construction.
			elements		
	consistent with claims 13, 15 and 23-26	consistent with claims 13, 15 and 23-26	consistent with claims 13, 15 and 23-26	in a manner that selects from among two or more options	consistent with claims 13, 15 and 23-26
	selectively:	selectively:	<i>selectively:</i> <i>MPT is collaterally</i>	, r · · · ·	selectively:
	in a manner that selects from among two or more	in a manner that selects from among two or more	estopped from relitigating this term		in a manner that selects from among two or more
	options	options			options
		II	in a manner that selects		
		that it is collaterally estopped.	options		
25. The apparatus of claim	<u>Function:</u> transforming	<u>Function:</u> transforming	<u>Function</u> : transforming		<u>Function:</u> transforming
24, in which the means for	groups of digital	groups of digital	groups of digital		groups of digital
comprises a means for	video signal into groups of	video signal into groups of	video signal into groups of		video signal into groups of
transforming groups of	frequency coefficients	frequency coefficients	frequency coefficients		frequency coefficients
digital representations in	related to the input video	related to the input video	related to the input video		related to the input video
the input video signal into groups of frequency	signal	signal	signal		signal
coefficients related to the		Structure: discrete cosine	Structure: discrete cosine		Structure: discrete cosine
input video signal		transform circuit 16 (as	transform circuit 16 (as		transform circuit 16 (as
		shown in Fig. 1 and as	shown in Fig. 1A and as		shown in Fig. 1 and as
		described at col. 7:5-col.	described at col. 6, line 62		described at col. 7:5-col.
		7:19)	– col. 7, line 19 and col. 7,		7:19)

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			lines 27-30) including the		
			blocks input to this		
			element and the transform		
			coefficients output by this		
			element		
		consistent with claims 1,	consistent with claims 1,		consistent with claims 1,
		23, 24, 25 and 31	23, 24, 25 and 31		23, 24, 25 and 31
		groups of digital representations:	groups of digital representations:		groups of digital representations:
			F		T
		This term should be given	a number of macroblocks,		This term should be given
		its plain meaning to one of	submacroblocks, and		its plain meaning to one of
		skill in the art. and	blocks of picture elements.		skill in the art. and
		therefore does not require	for example, 16x16		therefore does not require
		construction.	macroblocks of picture		construction.
			elements, 16x8 subblocks		
			of picture elements, and		
			8x8 blocks of picture		
			elements		
	consistent with claims 13,	consistent with claims 13,	consistent with claims 13,	in a manner that selects	consistent with claims 13,
	15 and 23-26	15 and 23-26	15 and 23-26	from among two or more	15 and 23-26
				options	
	selectively:	selectively:	selectively:		selectively:
			MPT is collaterally		
	in a manner that selects	in a manner that selects	estopped from relitigating		in a manner that selects
	from among two or more	from among two or more	this term.		from among two or more
	options	options			options
			in a manner that selects		
		However, plaintiff disputes	from among two or more		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		that it is collaterally	options		
		estopped.			
26. The apparatus of claim		Function: adaptively	Function: adaptively		Function: adaptively
24, in which the means for		performing a discrete	performing a discrete		performing a discrete
selectively transforming		cosine transform of the	cosine transform of the		cosine transform of the
comprises a means for		input video signal	input video signal in		input video signal in
adaptively performing a			response to the frame/field		response to the frame/field
discrete cosine transform		<u>Structure</u> :	encoding type signal		encoding type signal
of the input video signal					
in response to the		(a) block formatting circuit	Structure: block formatting		<u>Structure</u> :
frame/field encoding type		15A (as shown in Fig. 1	circuit 15a (as shown in		
signal.		and as described at col.	Fig. 1A and its internal		(a) block formatting circuit
		7:5-col. 7:10, col. 5:66-	circuitry as shown in Fig.		15A (as shown in Fig. 1
		6:3) and Fig. 6 (as	6, and as described at col.		and as described at col.
		described at col. 19:1-18);	6, line 59 to col. 7, line 14		7:5-col. 7:10, col. 5:66-6:3)
		and	and col. 19, lines 1-18)		and Fig. 6 (as described at
			including the coding type		col. 19:1-18); and
		(b) discrete cosine	signal and the digital video		
		transform circuit 16 (as	input signal or the estimate		(b) discrete cosine
		shown in Fig. 1 and as	error signal input to this		transform circuit 16 (as
		described at col. 7:5-col.	element, and the blocks		shown in Fig. 1 and as
		7:19)	output by this element; and		described at col. 7:5-col. 7:19)
			discrete cosine transform		
			circuit 16 (as shown in Fig.		
			1Aand as described at col.		
			6, line 62 – col. 7, line 19		
			and col. 7, lines 27-30),		
			including the blocks input		
			to this element and the		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			transform coefficients		
			output by this element;		
			interconnections between		
			these elements		
		consistent with claims 13,	consistent with claims 26		consistent with claims 26
		26 and 32	and 32		and 32
		adaptively:	adaptively:		adaptively:
		· ·			
		Plaintiff disputes that it is	No construction is		No construction is
		collaterally estopped from	necessary. This term		necessary. This term
		offering a proposed	should be given its		should be given its
		construction for this term.	ordinary meaning.		ordinary meaning.
		The term should be			
		construed as "capable of			
		changing in response to a condition"			
		consistent with claims 1, 2,	consistent with claims 1, 2,		consistent with claims 1, 2,
		13, 15, 23, 24, 26 and 31	13, 15, 23, 24, 26 and 31		13, 15, 23, 24, 26 and 31
		frame:	frame:		frame:
		a complete set of digital	a complete picture from a		a complete set of digital
		representations for an	video sequence		representations for an
		image			image

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		frame/field coding type:	frame/field coding type:		consistent with claims 1,
					14, 17, 23 and 26
		consistent with claims 1,	consistent with claims 1,		
		14, 17, 23 and 26	14, 17, 23 and 26		frame/field coding type:
					c c 11 1
		frame or field coding	frame coding or interlaced		frame or field coding
27 The annexative of claim		This tawa should be sizes	field coding		This tarms should be since
27. The apparatus of claim		its plain magning to and of	a vertical correlation		its plain magning to and of
24, III which the		skill in the art and	between successive		skill in the art and
characteristic comprises a		therefore does not require	macroblock and a vertical		therefore does not require
correlation between		construction	correlation between evenly		construction
predetermined portions		construction.	numbered horizontal lines		construction.
of the digital video input			and a vertical correlation		
signal			between oddly numbered		
			horizontal lines in		
			corresponding field		
			submacroblocks		
28. The apparatus of claim	Function: performing	Function: performing	Function: performing		Function: performing
24, in which the encoding	motion compensation	motion compensation	motion compensation		motion compensation
means comprises a means		~	~ .		~
for performing motion		<u>Structure</u> :	Structure: motion		<u>Structure</u> :
compensation			estimation circuit 37 (as		
		(a) summing element 11	snown in Fig. 1B and as		(a) summing element 11
		(as shown in Fig. 1 and as	11 18 col 12 lines 10 16		(as shown in Fig. 1 and as
		ucscribeu al col. 0.0-22);	and col 12 lines $37-42$		uescribeu al col. 0.0-22);
		(b) prediction selector 38B	including the digital video		(b) prediction selector 38B
		(as shown in Fig. 1 and as	input signal, signals		(as shown in Fig. 1 and as
		described at col. 10:23-48,	relating to the contents of		described at col. 10:23-48,

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		col. 12:10-12:36) and	the stores 36a and 36c, and		col. 12:10-12:36) and
			the picture type signal		
		i. Fig. 3 (as described at	input to this element, and		i. Fig. 3 (as described at
		col. 15:47-col. 16:27,	the motion vectors output		col. 15:47-col. 16:27,
		including previous picture	by this element;		including previous picture
		store 36c) or			store 36c) or
			estimation circuit 38 (as		
		ii. Fig. 4 (as described	shown in Fig. 1B and its		ii. Fig. 4 (as described
		at col. 16:28-col. 18:10,	internal circuitry as shown		at col. 16:28-col. 18:10,
		including previous picture	in Figs. 3, 4A, and 4B, and		including previous picture
		store 36c and next picture	as described at col. 10, line		store 36c and next picture
		store 36a), or	14 - col. 12, line 36, and		store 36a), or
			col. 15 line 47 to col. 18		
		iii. Fig. 3 and Fig. 4 (as	line 10) including the		iii. Fig. 3 and Fig. 4 (as
		described at col. 15:47-	motion vectors, picture		described at col. 15:47-
		18:10, including previous	type signal, and contents		18:10, including previous
		picture store 36c and next	of the next picture store		picture store 36c and next
		picture store 36a).	36a and the previous		picture store 36a).
			picture store 36c, input to		
			this element, and the		
			motion compensation type		
			signal and estimate of the		
			video input signal output		
			by this element; and		
			next picture store soa and		
			(as shown in Figs. 1P. 2		
			(as shown in Figs. 1B, 3,		
			4A, and $4B$, and as		
			described at col. 9, line 68		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			- col. 10, line 10, col. 15, lines 55-57, col. 16, lines 35-37, and col. 16, lines 40-42) including the frames of video data input to and output by these elements; including all interconnections between these elements		
29. The apparatus of claim 24, in which the encoding means comprises a means for quantizing the digital video input signal	<u>Function</u> : quantizing the digital video input signal	<u>Function</u> : quantizing the digital video input signal <u>Structure</u> : visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3), or Fig. 13 (as described at col. 24:61-col. 25:8)	<u>Function</u> : quantizing the digital video input signal <u>Structure</u> : visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1A and its internal circuitry as shown in Fig. 13, and as described at col. 7, line 27 - col. 8, line 5, col. 9, lines 19-22, col. 9, lines 34-37, col. 13, lines 22-25, and col. 24, line 61 to col. 25, line 8) including the transform coefficients, coding type signal, picture type signal, digital input signal, estimate error signal, inter/intra type signal input to this element and		<u>Function</u> : quantizing the digital video input signal <u>Structure</u> : visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1 and as described at col. 7:27-45, col. 5:66-6:3), or Fig. 13 (as described at col. 24:61-col. 25:8)

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
30. The apparatus of claim 24, in which the encoding means comprises a means for performing variable word length encoding	<u>Function</u> : performing variable word length encoding	Function: performing variable word length encoding Structure: encoder and multiplexer 24 (as shown in Fig. 1 and as described at col. 8:62-68, col. 9:14-22)	the quantized transform coefficients and quantization parameter output by this element <u>Function</u> : performing variable word length encoding <u>Structure</u> : variable word length choice analyzer 23a (as shown in Fig. 1A and its internal circuitry as shown in Fig. 10, configured to use the tables shown in Figs. 1G- 1N, and as described at col. 9, lines 3-13) including the ordered quantized transform coefficients and picture type signal input to this element, and the variable word length table select signal output by this element; scan selector circuit 23 (as		Function: performing variable word length encoding Structure: encoder and multiplexer 24 (as shown in Fig. 1 and as described at col. 8:62-68, col. 9:14-22)
			internal circuitry as shown in Fig. 14, and as		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			described at col. 8, line 36		
			– col. 9, line 2 and col. 25,		
			lines 9-25) including the		
			quantized transform		
			coefficients and coding		
			type signal input to this		
			element, and the ordered		
			quantized transform		
			coefficients output by this		
			element; and		
			variable word length and		
			fixed word length encoder		
			and multiplexer 24 (as		
			shown in Fig. 1A and as		
			described at col. 8, line 36		
			– col. 9 line 34, col. 12		
			lines 54-56, col. 12, lines		
			60-64, col. 13, lines 26-28,		
			and col. 13, line 63 – col.		
			14, line 1) including the		
			ordered quantized		
			transform coefficients,		
			block class signal,		
			quantization parameter,		
			picture type signal,		
			transform coefficients,		
			differential dc coefficient		
			prediction, variable word		
			length table select signal		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			and differential motion vectors input to this element, and the coded transform coefficients output by this element; including all interconnections between		
31. An apparatus for encoding digital video signals, comprising: a means for receiving a digital video input signal comprising a succession of digital representations of picture elements making up at least one video frame, the frame comprising a plurality of fields	<u>Structure:</u> input line 10 (as shown in Fig. 1 and described at col. 3:61-65)	<u>Function</u> : receiving a digital video input signal <u>Structure:</u> input line 10 (as shown in Fig. 1 and described at col. 3:61-65)	these elementsFunction: receiving a digital video input signal comprising a succession of digital representations of picture elements making up at least one video frame, the frame comprising a plurality of fieldsStructure: input line 10 (as shown in Fig. 1 and described at col. 3:61-65)		<u>Function</u> : receiving a digital video input signal comprising a succession of digital representations of picture elements making up at least one video frame, the frame comprising a plurality of fields <u>Structure:</u> input line 10 (as shown in Fig. 1 and described at col. 3:61-65)
		<i>consistent with claims 23, 24 and 31</i> fields: subsets of a frame consisting of groups of contiguous picture elements	 consistent with claims 2, 23, 24 and 31 fields: a set of odd horizontal scan lines and a set of even horizontal scan lines that together make up a 		<i>consistent with claims 23, 24 and 31</i> fields: subsets of a frame consisting of groups of contiguous picture elements

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			complete picture from a video sequence		
a means for performing adaptive motion compensated encoding of groups of digital representations in the input signal relating to one of frames and fields in the input signal; and,	<u>Function</u> : performing adaptive motion compensated encoding of groups of digital representations in the input signal relating to one of frames and fields in the input signal	<u>Function</u> : performing adaptive motion compensated encoding of groups of digital representations in the input signal relating to one of frames and fields in the input signal	<u>Function</u> : performing adaptive motion compensated encoding of groups of digital representations in the input signal relating to one of frames and fields in the input signal		<u>Function</u> : performing adaptive motion compensated encoding of groups of digital representations in the input signal relating to one of frames and fields in the input signal
		Structure (a) prediction selector 38B (as shown in Fig. 1 and as described at col. 10:23-48, col. 12:10-12:36) and i. Fig. 3 (as described at col. 15:47-col. 16:27, including previous picture	<u>Structure</u> : motion vector prediction circuit 41 (as shown in Fig. 1A and the circuitry within circuit 41 as shown and described in Figs. 15, 16A, and 16B, and the description of circuit 41 and its internal circuitry set		Structure (a) prediction selector 38B (as shown in Fig. 1 and as described at col. 10:23-48, col. 12:10-12:36) and i. Fig. 3 (as described at col. 15:47-col. 16:27, including previous picture
		store 36c) or ii. Fig. 4 (as described at col. 16:28-col. 18:10, including previous picture store 36c and next picture store 36a), or iii. Fig.3 and Fig. 4 (as described at col. 15:47-	forth in col. 12 lines 39-49 and in col. 25 line 26 - col. 27 line 34); variable word length and fixed word length encoder and multiplexer 24 (as shown in Fig. 1A and as described at col. 8, line 36 – col. 9 line 34, col. 12		store 36c) or ii. Fig. 4 (as described at col. 16:28-col. 18:10, including previous picture store 36c and next picture store 36a), or iii. Fig.3 and Fig. 4 (as described at col. 15:47-

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		18:10, including previous	lines 54-56, col. 12, lines		18:10, including previous
		picture store 36c and next	60-64, col. 13, lines 26-28,		picture store 36c and next
		picture store 36a);	and col. 13, line $63 - col$.		picture store 36a);
			14, line 1) including the		
		(b) summing element 11	ordered quantized		(b) summing element 11
		(as shown in Fig. 1 and as	transform coefficients,		(as shown in Fig. 1 and as
		described at col. 6:6-22);	block class signal,		described at col. 6:6-22);
			quantization parameter, the		
		(c) block formatting circuit	picture type signal, and		(c) block formatting circuit
		15A (as shown in Fig. 1	differential motion vectors		15A (as shown in Fig. 1
		and as described at col.	input to this element, and		and as described at col.
		6:59-66, col. 5:66-6:3),	the coded transform		6:59-66, col. 5:66-6:3), and
		and Fig. 6 (as described at	coefficients output by this		Fig. 6 (as described at col.
		col. 19:1-18);	element; and		19:1-18);
		(d) discrete cosine	summing element 12 (as		(d) discrete cosine
		transform circuit 16 (as	shown in Fig. 1A and as		transform circuit 16 (as
		shown in Fig. 1 and as	described at col. 12 lines		shown in Fig. 1 and as
		described at col 7:5-col	50-53) including the		described at col 7:5-col
		7:10): and	motion vector estimate and		7.10): and
		7.10), and	the motion vector signal		7.10), and
		(e) visibility matrix	input to this element and		(e) visibility matrix
		selector and perceptual	the differential motion		selector and perceptual
		quantizer 19 (as shown in	vector signal output by this		quantizer 19 (as shown in
		Fig. 1 and as described at	element: including all		Fig. 1 and as described at
		col. 7:27-45. col. 5:66-	interconnections between		col. 7:27-45. col. 5:66- 6:3)
		6:3) or Fig. 13 (as	these elements		or Fig. 13 (as described at
		described at col. 24:61-col.			col. 24:61-col. 25:8).
		25:8).			
		consistent with claims 14,	consistent with claims 14,		consistent with claims 14,

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		15, 31 and 33	31 and 33		31 and 33
		adaptive:	adaptive:		adaptive:
		Plaintiff disputes that it is collaterally estopped from offering a proposed construction for this term.	No construction is necessary. This term should be given its ordinary meaning.		No construction is necessary. This term should be given its ordinary meaning
		This term should be construed consistent with the term "adaptively," defined above, as "capable of changing in response to a condition"			
		<i>consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31</i>	consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31		consistent with claims 1, 2, 13, 15, 23, 24, 26 and 31
		frame:	frame:		frame:
		a complete set of digital representations for an image	a complete picture from a video sequence		a complete set of digital representations for an image
		consistent with claims 1, 23, 24, 25 and 31	consistent with claims 1, 23, 24, 25 and 31		consistent with claims 1, 23, 24, 25 and 31
		groups of digital representations:	groups of digital representations:		groups of digital representations:
		This term should be given	a number of macroblocks,		This term should be given

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		its plain meaning to one of skill in the art, and therefore does not require construction.	submacroblocks, and blocks of picture elements, for example, 16x16 macroblocks of picture elements, 16x8 subblocks of picture elements, and 8x8 blocks of picture elements		its plain meaning to one of skill in the art, and therefore does not require construction.
a means responsive to the video input signal prior to encoding for producing a motion compensation type signal for controlling the adaptive motion compensated encoding means		<u>Function</u> : producing a motion compensation type signal <u>Structure</u> : motion compensated prediction analyzer 38A (as shown in Fig. 1 and as described at col. 12:25- 30).	<u>Function</u> : producing a motion compensation type signal for controlling the adaptive motion compensated encoding means <u>Structure</u> : motion estimation circuit 37 (as shown in Fig. 1B and as described at col. 10, lines 11-18, col. 12, lines 10-16, and col. 12, lines 37-42) including the digital video input signal, signals relating to the contents of the stores 36a and 36c, and the picture type signal input to this element, and the motion vectors output by this element;		<u>Function</u> : producing a motion compensation type signal for controlling the adaptive motion compensated encoding means <u>Structure</u> : motion compensated prediction analyzer 38A (as shown in Fig. 1 and as described at col. 12:25-30). [The Court requests the parties to discuss the motion estimation circuit 37 and the next picture store 36a at the hearing.]

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			estimation circuit 38 (as		
			shown in Fig. 1B and its		
			internal circuitry as shown		
			in Figs. 3, 4A, and 4B, and		
			as described at col. 10, line		
			14 – col. 12, line 36, and		
			col. 15 line 47 - col. 18		
			line 10) including the		
			motion vectors, picture		
			type signal, and contents		
			of the next picture store		
			36a and the previous		
			picture store 36c, input to		
			this element, and the		
			motion compensation type		
			signal and estimate of the		
			video input signal output		
			by this element; and		
			next picture store 36a and		
			previous picture store 36c		
			(as shown in Figs. 1B, 3,		
			4A, and 4B, and as		
			described at col. 9, line 68		
			– col. 10, line 10, col. 15,		
			lines 55-57, col. 16, lines		
			35-37, and col. 16, lines		
			40-42) including the		
			frames of video data input		
			to and output by these		
CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
---------------------------	-------------------------------------	--------------------------------------------	--------------------------------------------	----------------------------------	---------------------------------------
			elements; including all		
			interconnections between		
		• • • • • • • • • • • • • • • • • • • •	these elements	· 1.1 . · 1 . · C	
		consistent with claims 13,	consistent with claims 13,	a signal that identifies one	consistent with claims 13,
		15 and 31	15 and 31	of two or more available	15 and 31
				modes of	
		motion compensation	motion compensation	motion compensation to	motion compensation
		type signal:	type signal:	be used in motion	type signal:
				compensated	· · · · · · · · · · · · · · · · · · ·
		a signal that identifies one	MPT is collaterally	decoding of a video signal	a signal that identifies one
		of two or more available	estopped from relitigating		of two or more available
		modes of motion	this term.		modes of
		compensation to be used in			motion compensation to be
		motion compensation	a signal that identifies one		used in motion
			of two or more available		compensated
		However, plaintiff disputes	modes of motion		decoding of a video signal
		that it is collaterally	compensation to be used in		
		estopped.	motion compensated		
			decoding of a video signal		
32. a means for receiving	<u>Function</u> : receiving digital	<u>Function</u> : receiving a	<u>Function</u> : receiving digital		<u>Function</u> : receiving digital
digital video input	video input signals	digital video input signal	video input signals		video input signals
signals					
	<u>Structure:</u> input line 10 (as	<u>Structure</u> : input line 10 (as	<u>Structure</u> : input line 10 (as		<u>Structure:</u> input line 10 (as
	shown in Fig. 1 and	shown in Fig. 1 and	shown in Fig. 1 and		shown in Fig. 1 and
	described at col. 3:61-65)	described at col. 3:61-65)	described at col. 3:61-65)		described at col. 3:61-65)
a means for performing		<u>Function</u> : performing	<u>Function</u> : performing		<u>Function</u> : performing
variable word length		variable word length	variable word length		variable word length
encoding adaptively in		encoding adaptively	encoding adaptively in		encoding adaptively in
response to the video			response to the video input		response to the video input
input signals		Structure:	signals		signals.

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
		a) variable word length	Structure:		Structure:
		choice analyzer 23A (as	block formatting circuit		
		shown in Fig. 1 and	15a (as shown in Fig. 1A		a) variable word length
		described at col. 9:3-8 and	and its internal circuitry as		choice analyzer 23A (as
		as shown in Figure 10 and	shown in Fig. 6, and as		shown in Fig. 1 and
		as described at col. 21:50-	described at col. 6, line 59		described at col. 9:3-8 and
		23:23), and encoder and	- col. 7, line 14 and col.		as shown in Figure 10 and
		multiplexer 24 (as shown	19, lines 1-18) including		as described at col. 21:50-
		in Fig. 1 and as described	the coding type signal and		23:23), and encoder and
		at col. 9:8-30); see also	the digital video input		multiplexer 24 (as shown
		col. 4:65-68; or	signal or the estimate error		in Fig. 1 and as described
			signal input to this		at col. 9:8-30); see also col.
		b) encoder and multiplexer	element, and the blocks		4:65-68; or
		24 (as shown in Fig. 1 and	output by this element;		
		as described at col. 9:8-30)			b) encoder and multiplexer
		and	discrete cosine transform		24 (as shown in Fig. 1 and
			circuit 16 (as shown in Fig.		as described at col. 9:8-30)
		i. scan selector 23 (as	1A and as described at col.		and
		described at col. 8:36-	6, line 62 – col. 7, line 19		
		9:8); or	and col. 7, lines 27-30)		i. scan selector 23 (as
			including the blocks input		described at col. 8:36-9:8);
		ii. Fig. 14 (as described at	to this element and the		or
		col. 25:9-25)	transform coefficients		
			output by this element;		ii. Fig. 14 (as described at
					col. 25:9-25)
			visibility matrix selector		
			and perceptual quantizer		[The Court requests the
			19 (as shown in Fig. 1A		parties to discuss the
			and its internal circuitry as		visibility matrix and
			shown in Fig. 13, and as		perceptual quantizer 19,

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			described at col. 7, line 27		variable word length
			- col. 8, line 5, col. 9, lines		choice analyzer 23a, and
			19-22, col. 9, lines 34-37,		variable word length and
			col. 13, lines 22-25, and		fixed word length encoder
			col. 24, line $61 - col. 25$,		and multiplexer 24 at the
			line 8) including the		hearing.]
			transform coefficients,		
			coding type signal, picture		
			type signal, digital input		
			signal, estimate error		
			signal and fullness signal		
			input to this element and		
			the quantized transform		
			coefficients and		
			quantization parameter		
			output by this element:		
			output by this clement,		
			variable word length		
			choice analyzer 23a (as		
			shown in Fig. 1A and its		
			internal circuitry as shown		
			in Fig. 10, configured to		
			use the tables shown in		
			Figs. 1G-1N, and as		
			described at col. 9, lines 3-		
			13) including the ordered		
			quantized transform		
			coefficients and picture		
			type signal input to this		

	element, and the variable word length table select signal output by this element;	
	scan selector circuit 23 (as shown in Fig. 1A and its internal circuitry as shown in Fig. 14, and as described at col. 8, line 36 – col. 9, line 2 and col. 25, lines 9-25) including the quantized transform coefficients and coding type signal input to this element, and the ordered quantized transform coefficients output by this element; and	
	variable word length and fixed word length encoder and multiplexer 24 (as shown in Fig. 1A and as described at col. 8, line 36 – col. 9 line 34, col. 12 lines 54-56, col. 12, lines 60-64, col. 13, lines 26-28, and col. 13, line 63 – col.	

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			ordered quantized transform coefficients, block class signal, quantization parameter, picture type signal, transform coefficients, differential dc coefficient prediction, variable word length table select signal and differential motion vectors input to this element, and the coded transform coefficients output by this element; including all interconnections between these elements		
		<i>consistent with claims 13,</i> 26 and 32 adaptively: Plaintiff disputes that it is collaterally estopped from offering a proposed construction for this term. The term should be construed as "capable of changing in response to a condition"	consistent with claims 26 and 32 adaptively: No construction is necessary. This term should be given its ordinary meaning.		<i>consistent with claims 26</i> <i>and 32</i> adaptively: No construction is necessary. This term should be given its ordinary meaning.

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
33. The apparatus of claim	Function: transforming the	Function: transforming the	Function: transforming the		Function: transforming the
32, further comprising:	digital video input signals	digital video input signals	digital video input signals		digital video input signals
	into transform coefficients	into transform coefficients	into transform coefficients		into transform coefficients
a means of transforming					
the digital video input		Structure: discrete cosine	Structure: block formatting		Structure: discrete cosine
signals into transform		transform circuit 16 (as	circuit 15a (as shown in		transform circuit 16 (as
coefficients		shown in Fig. 1 and as	Fig. 1A and its internal		shown in Fig. 1 and as
coefficients,		described at col. 7:5 7:30)	circuitry as shown in Fig		described at col. 7:5 7:20)
		described at col. 7.3-7.30)	Circuit y as shown in Fig.		described at col. 7.3-7.30)
			6, and as described at col.		
			0, line 59 - col. /, line 14		[The Court requests the
			and col. 19, lines 1-18),		parties to discuss the block
			including the coding type		formatting circuit 15a at
			signal and the digital video		the hearing.]
			input signal or the estimate		
			error signal input to this		
			element and the blocks		
			output by this element; and		
			discrete cosine transform		
			circuit 16 (as shown in Fig.		
			1A and as described at col.		
			6, line 62 – col. 7, line 19		
			and col. 7, lines 27-30),		
			including the blocks input		
			to this element and the		
			transform coefficients		
			output by this element;		
			including the		
			interconnection between		
			these elements		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
the encoding means being		Function: performing	The proper term for		Function: performing
responsive to the		adaptive variable word	construction is:		adaptive variable word
transform coefficients for		length coding			length coding
performing adaptive			"a means for performing		
variable word length		Structure:	variable world length		Structure:
coding			encoding adaptively in		
		a) variable word length	response to the video		a) variable word length
		choice analyzer 23A (as	input signals"		choice analyzer 23A (as
		shown in Fig. 1 and			shown in Fig. 1 and
		described at col. 9:3-8	"the encoding means		described at col. 9:3-8
		and as shown in Figure 10	being responsive to the		and as shown in Figure 10
		and as described at col.	transform coefficients for		and as described at col.
		21:50- 23:23), and encoder	performing adaptive		21:50-23:23), and encoder
		and multiplexer 24 (as	variable word length		and multiplexer 24 (as
		shown in Fig. 1 and as	encoding"		shown in Fig. 1 and as
		described at col. 9:8-30);			described at col. 9:8-30);
		<i>see also</i> col. 4:65-68;	Function:		see also col. 4:65-68;
		or	performing variable word		or
			length encoding adaptively		
		b) encoder and multiplexer	in response to the video		b) encoder and multiplexer
		24 (as shown in Fig. 1 and	input signals and the		24 (as shown in Fig. 1 and
		as described at col. 9:8-30)	transform coefficients		as described at col. 9:8-30)
		and			and
		i. scan selector 23	Structure:		i. scan selector 23 (as
		(as described at	block formatting circuit		described at col. 8:36- 9:8);
		col. 8:36- 9:8); or	15a (as shown in Fig. 1A		or
		ii. Fig. 14 (as	and its internal circuitry as		ii. Fig. 14 (as
		described at col.	shown in Fig. 6, and as		described at col. 25:9-25)
		25:9-25)	described at col. 6, line 59		
			- col. 7, line 14 and col.		[The Court requests the

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			19, lines 1-18) including the coding type signal and the digital video input signal or the estimate error signal input to this element, and the blocks output by this element; discrete cosine transform circuit 16 (as shown in Fig. 1A and as described at col. 6, line 62 – col. 7, line 19 and col. 7, lines 27-30) including the blocks input to this element and the transform coefficients output by this element; visibility matrix selector and perceptual quantizer 19 (as shown in Fig. 1A and its internal circuitry as shown in Fig. 13, and as described at col. 7, line 27 - col. 8, line 5, col. 9, lines		parties to discuss the block formatting circuit 15a, the visibility matrix selector and perceptual quantizer 19, the variable word length choice analyzer 23a, and the variable word length and fixed word length encoder and multiplexer 24.]
			col. 13, lines 22-25, and col. 24, line 61 - col. 25, line 8) including the transform coefficients,		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			coding type signal, picture		
			type signal, digital input		
			signal, estimate error		
			signal, inter/intra type		
			signal, and fullness signal		
			input to this element, and		
			the quantized transform		
			coefficients and		
			quantization parameter		
			output by this element;		
			veriable word langth		
			shoise analyzer 22a (as		
			choice analyzer 25a (as		
			internal circuitry as shown		
			in Fig. 10, configured to		
			In Fig. 10, configured to		
			Figs 1G 1N and as		
			described at col 9 lines 3		
			13) including the ordered		
			quantized transform		
			coefficients and picture		
			type signal input to this		
			element, and the variable		
			word length table select		
			signal output by this		
			element;		
			scan selector circuit 23 (as		
			shown in Fig. 1A and its		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			internal circuitry as shown		
			in Fig. 14, and as		
			described at col. 8, line 36		
			– col. 9, line 2 and col. 25,		
			lines 9-25) including the		
			quantized transform		
			coefficients and coding		
			type signal input to this		
			element, and the ordered		
			quantized transform		
			coefficients output by this		
			element, and		
			variable word length and		
			fixed word length encoder		
			and multiplexer 24 (as		
			shown in Fig. 1A and as		
			described at col. 8, line 36		
			– col. 9 line 34, col. 12		
			lines 54-56, col. 12, lines		
			60-64, col. 13, lines 26-28,		
			and col. 13, line $63 - col$.		
			14, line 1) including the		
			ordered quantized		
			transform coefficients,		
			block class signal,		
			quantization parameter,		
			picture type signal,		
			transform coefficients,		
			differential dc coefficient		

CLAIM TERM	AGREED PROPOSED CONSTRUCTION	PLAINTIFF'S PRELIMINARY CONSTRUCTION	DEFENDANTS' PRELIMINARY CONSTRUCTION	COURT'S PREVIOUS CONSTRUCTION	COURT'S CONSTRUCTION
			prediction, variable word length table select signal and differential motion vectors input to this element, and the coded transform coefficients output by this element; including all interconnections between		
		consistent with claims 14, 15, 31 and 33	these elements consistent with claims 14, 31 and 33		consistent with claims 14, 31 and 33
		adaptive:	adaptive:		adaptive:
		Plaintiff disputes that it is collaterally estopped from offering a proposed construction for this term.	No construction is necessary. This term should be given its ordinary meaning.		No construction is necessary. This term should be given its ordinary meaning.
		This term should be construed consistent with the term "adaptively," defined above, as "capable of changing in response to a condition"			

¹ As amended by the Certificate of Correction.