

**Appendix A to Plaintiffs' Red Bend Ltd. and Red Bend Software Inc.'s Opening Claim Construction Brief**  
**Red Bend Ltd. v. Google Inc., Civil Action No. 09-cv-11813-DPW**  
**Proposed Claim Constructions - July 15, 2010**

	<b>Claim Terms at Issue</b>	<b>Independent Claims</b>	<b>Red Bend Proposed Construction</b>	<b>Google Proposed Construction</b>
1	compact difference result	8, 12, 21, 25, 42, 46, 55, 59	A difference result of a smaller size as compared to a conventional difference result (obtained by using techniques in existence prior to the invention of the patent-in-suit) in which the need to reflect changes to references due to delete/insert modifications is reduced or eliminated.	A difference result in which references that have changed due to delete/insert modifications do not appear.
2	data table	42, 46, 55, 59	A table of entries, where an entry is an addressable unit within the data table. Each entry may have a different size. An executable program is one example of a data table.	A table of entries, each of which may have a different size. An executable program is one example of a data table. It cannot be source or other symbolic code.
3	executable program	8, 12, 21, 25	A program comprising machine language instructions and corresponding bytes of data used by the program that are ready to be run on a computer.	A program comprising machine language instructions and corresponding bytes of data used by the program that are ready to be run on a computer, excluding source or other symbolic code.
4	invariant references	8, 12, 21, 25, 42, 46, 55, 59	Values made the same.	Values made the same in the modified old and new programs (or data tables) for corresponding reference entries so that the reference addresses are excluded from the difference result.
5a	modified old data table	42, 46, 55, 59	An interim result, such as tables or data structures, related to the old data table.	A version of the actual program or data table in its original executable form, with certain portions replaced.

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5b	modified old program	8, 12, 21, 25	An interim result, such as tables or data structures, related to the old executable program.	
5c	modified new data table	42, 46, 55, 59	An interim result, such as tables or data structures, related to the new data table.	
5d	modified new program	8, 12, 21, 25	An interim result, such as tables or data structures, related to the new executable program.	

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**Agreed Terms**

<b>Claim Term</b>	<b>Independent Claims</b>	<b>Agreed Construction</b>
difference result	8, 12, 21, 25, 42, 46, 55, 59	Data representative of the difference between an old program (or data table) and a new program (or data table) used to carry out an update of the old program.
old executable program; said old program	8, 12, 21, 25	An executable program (or portion of an executable program) that is to be updated.
old data table	42, 46, 55, 59	A data table (or portion of a data table) that is to be updated.
reference	8, 12, 21, 25, 42, 46, 55, 59	A part of the data appearing in an entry in the data table which is used to refer to some other entry from the same data table. A reference can be either an address or a number used to compute an address.
reference entries	8, 12, 21, 25, 42, 46, 55, 59	Entries that include references. For this purpose, "entries" are addressable units of a data table or program. As an example, a reference entry could be an individual machine instruction (such as an individual jump instruction) specifying a target address.