EXHIBIT A

Claim Construction Questions – Belanger Deposition

Q. Can you tell me what the home node does? Belanger Tr. 85:6

Q. Can you tell me what the query node does, according to the summary of the invention? Belanger Tr. 86:1-2

Q. Can you tell me what a hashed fragment is? Belanger Tr. 86:9

Q. Can you tell me what is transmitted by the home node, according to the summary of the invention? Belanger Tr. 86:18-20

Q. So you're not going to answer the questions based on the objection of counsel, objections to form and privilege?
A. Yes.
      MR. VALEK: What questions?
      MR. WOLFF: The questions about claims.
      MR. VALEK: Like claim construction?
      MR. WOLFF: It could be claim construction, yes. Belanger Tr. 89:22-25-90:5

Q. Okay. Let's turn to Exhibit 4. And why don't you tell me what Jarg -- this is on page 2 of Exhibit 4. And why don't you tell me what Jarg's understanding of fuzzy queries as used in these contentions means? Belanger Tr. 134:14-18

Q. All right. And can you tell me what Jarg's understanding of a non-relational, distributed database system is? Belanger Tr. 135:11-13

Q. Any query would be a fuzzy query?
      MR. VALEK: Objection. Form.
A. Any query would be a fuzzy query? This really gets into what a fuzzy query is, and that's our interpretation of the claims and that is a privileged matter. Belanger Tr. 135:25-136:5

Q. Can you tell me what the clause "a plurality of home nodes" means to Jarg? Belanger Tr. 138:4-5

Q. So would any cluster of a few thousand machines be a plurality of home nodes? Belanger Tr. 139:2-3

Q. All right. So moving on to the next clause here, "connected by a network, said method comprising the step of," what is Jarg's understanding of the phrase "connected by a network." Belanger Tr. 142:22-25-143:1

Q. Is it Jarg's position that any computers connected with a network or connected via Ethernet satisfies this limitation? Belanger Tr. 143:7-9

Q. All right. Can you tell me what the phrase "randomly selecting the first one of said plurality of home nodes" means to Jarg? Belanger Tr. 143:24-25-144:1

Q. Can you tell me what the clause "fragmenting by said selected home node, a query from a user into a plurality of query fragments" means to Jarg? Belanger Tr. 145:11-14

Q. And so what is it in that phrase that triggers in Jarg's understanding that this limitation is satisfied? Belanger Tr. 146:16-18

Q. All right. Next page. The limitation beginning "hashing." Can you tell me what this clause means to Jarg? Belanger Tr. 146:25-147: 2

Q. Okay. Can you tell me what Jarg's understanding of a URL is? Belanger Tr. 152:19-20

Q. Next claim element, "transmitting." Do you see that?
A. Yes.
Q. All right. What is -- what does this clause mean to Jarg? Belanger Tr. 169:17-21

Q. All right. Turning to Exhibit 4, page 4, the clause that spans the next page 2, "using by said query node," can you tell me what this claim limitation means to you? Belanger Tr. 174:18-21

Q. So if I asked you Jarg's understanding of the clauses in the remaining claims, would I get the same answer you've been giving me all day, which is that you can't answer based upon privilege grounds? Belanger Tr. 182:8-12

Q. Okay. Can you tell me what the – what Jarg's understanding of the home nodes are as described in Exhibit 6? Belanger Tr. 186:10-12

Q. So any activity would be hashing under Jarg's contention? Belanger Tr. 195:1-2
Q. How about, can you tell me how the word "parse" relates to the term "fragmenting"? Belanger Tr. 213:12-13

Claim Construction Questions – Pirri Deposition

Q. Turning to page 2 of Exhibit 4, the first contention says in the right-most column, "To the extent the preamble is a limitation on the scope of the claim, this element is present." Is it Northeastern's position that the preamble is a limitation or not? Pirri Tr. 36:15-20

Q. Did the university prepare a claim construction analysis for the '593 patent? Pirri Tr. 36:24-25

Q. So can you tell me what a non-relational distributed database is? Pirri Tr. 37:17-18

Q. And can you tell me what the patent describes a non-relational, distributed database is? Pirri Tr. 37:25-37:1-2

Q. If I gave you a copy of the patent, could you explain to me what a non-relational, distributed database is? Pirri Tr. 38:7-9

Q. All right. But outside of any communications with counsel, are you aware of any claim construction analysis that was done by the university pertaining to the infringement contentions which are Exhibit 4? Pirri Tr. 42:5-9

Q. All right. Let's go back to Exhibit 4. And my question, which was, are you able to describe to me a non -- what a non-relational, distributed database is? Pirri Tr. 45:4-7

Q. All right. Are you able to tell me what a home node is? Pirri Tr. 45:15-16

Q. Can you tell me what a plurality of query nodes are, according to the patent? Pirri Tr. 47:11-12

Q. Okay. All right. Well, let's turn back to Exhibit 4 and finish this up. If you could turn to page 3, the clause that reads, "Randomly selecting a first one of said plurality of home nodes," can you tell me what that clause means to Northeastern? Pirri Tr. 51:12-17

Q. Do you have any understanding of what the term "randomly selecting" means? Pirri Tr. 52:9-10

Q. All right. Moving to the next clause, "Fragmenting, by said selected home node, a query from a user into a plurality of query fragments," do you understand what this clause means? Pirri Tr. 52:13-16

Q. Do you understand how this clause applies to Google? Pirri Tr. 52:19-20

Q. All right. But you can't enlighten me any further about the basis for your contention that Google infringes or satisfies this element; is that correct? Pirri Tr. 53:3-8

Q. All right. What does that clause mean to Northeastern? Pirri Tr. 53:15-16

Q. The next clause, "Transmitting, by said selected home node," are you able to tell me what this clause means to Northeastern? Pirri Tr. 54:3-5

Q. Next clause beginning, "using," scrolls to page five as well. Are you able to tell me what this clause means to Northeastern? . . . A. Only as presented in the document. Pirri Tr. 54:17-25

Q. All right. Next clause, returning -- excuse me. Strike that. Next clause, beginning, "returning." Are you able to tell me Northeastern's understanding of this clause? Pirri Tr. 55:5-9

Q. Are you able to tell me how this clause applies to Google? Pirri Tr. 55:12-13

Q. Are you able to tell me how this claim applies to Google? Pirri Tr. 55:20-21

Q. So Northeastern is not able to at this time tell me what any of the clauses mean to it? Pirri Tr. 56:17-18

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