

Appendix A - Joint Claim Constructions of Plaintiffs and Defendant for 5,694,593

Disputed Claims	Plaintiffs' Proposed Construction	Google's Proposed Construction	Court's Construction
<p>1. A method for information retrieval using fuzzy queries in a non-relational, distributed database system having a plurality of home nodes and a plurality of query nodes connected by a network, said method comprising the steps of:</p>	<p>“fuzzy queries” [AGREED]</p> <p>“non-relational, distributed database system” “a database not using a relational model that is distributed among a plurality of interconnected computer nodes”</p> <p>“a plurality of home nodes and a plurality of query nodes connected by a network” The claim language has its plain and ordinary meaning; no further construction necessary.</p>	<p>“fuzzy queries” [AGREED]</p> <p>“non-relational, distributed database system” “a database, stored across multiple computers on a network, wherein data objects exist independently of their attribute values, and wherein data is not extracted using relational algebra”</p> <p>“a plurality of home nodes and a plurality of query nodes connected by a network” “a plurality of home nodes and query nodes connected by a network arranged with no central server and wherein, for any given query, any node may be defined as a home node or a query node”</p>	<p>“fuzzy queries” “imprecise or inexact requests for information from a database, the result of which does not necessarily contain each term in the query”</p>

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1[a] randomly selecting a first one of said plurality of home nodes;	“randomly selecting” “selecting without an apparent pattern”	“randomly selecting” “selecting by chance, independently of preceding selections, where each item in the set has equal probability of being chosen”	
1[b] fragmenting, by said selected home node, a query from a user into a plurality of query fragments ;	“query fragment” “a sub-part or piece of a query”	“query fragment” “a part of a query consisting of a limited number of attributes and attribute values joined by relationships, specified in the same formal, artificial language and ontology which describes the attribute values of objects of the database”	
1[c] hashing , by said selected home node, each said query fragment of said plurality of query fragments , said hashed query fragment having a first portion and a second portion ;	“hashing” “a computer technique whereby one or more functions are used to transform values into corresponding values” “a first portion and a second portion” The claim language has its plain and ordinary meaning; no further construction necessary.	“hashing” “performing a mathematical function on a key value to generate the address of the location of data associated with the key value” “a first portion and a second portion” “a first part separate and distinct from a second part”	
1[d] transmitting , by said selected home node, each said	“transmitting, by said selected home node, each said	“transmitting, by said selected home node, each said	

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<p>hashed query fragment of said plurality of query fragments to a respective one of said plurality of query nodes indicated by said first portion of each said hashed query fragment;</p>	<p>hashed query fragment of said plurality of query fragments to a respective one of said plurality of query nodes indicated by said first portion of each said hashed query fragment” The claim language has its plain and ordinary meaning; no further construction necessary.</p>	<p>hashed query fragment of said plurality of query fragments to a respective one of said plurality of query nodes indicated by said first portion of each said hashed query fragment” “the selected home node sends each hashed query fragment to exactly one node on the network, that node being identified by said first portion of the hashed query fragment”</p>	
<p>1[e] using, by said query node, said second portion of said respective hashed query fragment to access data according to a local hash table located on said query node; and</p>	<p>“using, by said query node, said second portion of said respective hashed query fragment to access data according to a local hash table located on said query node” The claim language has its plain and ordinary meaning; no further construction necessary.</p> <p>“local hash table” “a table that associates hash values with</p>	<p>“using, by said query node, said second portion of said respective hashed query fragment to access data according to a local hash table located on said query node” “each query node receiving a hashed query fragment uses the second portion of the hashed query fragment as a key value to identify the address of data according to a local hash table stored on that query node”</p> <p>“local hash table” “a table resident on and unique to a</p>	

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	other data”	particular query node in which the unique location of the information in the table is determined by hashing a key value”	
1[f] returning, by each said query node accessing data according to said respective hashed query fragment, an object identifier corresponding to said accessed data to said selected home node.	“returning, by each said query node” The claim language has its plain and ordinary meaning; no further construction necessary.	“returning, by each said query node” “each query node that accesses data returns an object identifier to the home node”	
3. The method of claim 1 further comprising the steps of: 3[a] determining, by said home node, a measure of relevance between said accessed data and said query; and 3[b] returning, to said user, by said home node, accessed data having a predetermined degree of relevance , subsequent to the step of returning said object identifier.	“predetermined degree of relevance” “a degree of relevance that is determined before returning accessed data to the user”	“predetermined degree of relevance” “a predefined degree of similarity; only results meeting or exceeding a predetermined level are returned to the user after the object identifier has been returned”	
8. A non-relational, distributed database system	“non-relational, distributed	“non-relational, distributed	

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having an information retrieval tool for handling queries from a user, comprising:	database system” See 1 above	database system” See 1 above	
<p>8[a] a plurality of home nodes; and</p> <p>8[b] a plurality of query nodes;</p> <p>8[c] said plurality of home nodes and said plurality of query nodes connected by a network,</p>	“a plurality of home nodes; and a plurality of query nodes; said plurality of home nodes and said plurality of query nodes connected by a network,” See 1 above	“a plurality of home nodes; and a plurality of query nodes; said plurality of home nodes and said plurality of query nodes connected by a network,” See 1 above	
<p>8[d] wherein each said home node, upon receiving a query from a user, fragments said query into a plurality of query fragments, hashes each said query fragment of said plurality of query fragments into a hashed query fragment having a first portion and a second portion, and transmits each said hashed query fragment to a respective one of said plurality of query nodes indicated by said first portion of said hashed query</p>	<p>“query fragment” See 1[b] above</p> <p>“hashes” See 1[c] (“hashing”) above</p> <p>“a first portion and a second portion” See 1[c] above</p> <p>“transmits each said hashed query fragment to a respective one of said plurality of query nodes indicated by said first portion of said hashed query fragment” See 1[d]</p>	<p>“query fragment” See 1[b] above</p> <p>“hashes” See 1[c] (“hashing”) above</p> <p>“a first portion and a second portion” See 1[c] above</p> <p>“transmits each said hashed query fragment to a respective one of said plurality of query nodes indicated by said first portion of said hashed query fragment” See 1[d]</p>	

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fragment , and	("transmitting...") above	("transmitting...") above	
8[e] further wherein each said query node uses said second portion of said hashed query fragment to access data according to a local hash table located on said query node and returns an object identifier corresponding to said accessed data to said home node.	<p>"each said query node uses said second portion of said hashed query fragment to access data according to a local hash table located on said query node" See 1[e] ("using...") above</p> <p>"local hash table" See 1[e] above</p> <p>"each said query node...returns" See 1[f] ("returning...") above</p>	<p>"each said query node uses said second portion of said hashed query fragment to access data according to a local hash table located on said query node" See 1[e] ("using...") above</p> <p>"local hash table" See 1[e] above</p> <p>"each said query node...returns" See 1[f] ("returning...") above</p>	
9. The distributed database system of claim 8 wherein said home node determines a measure of relevance between said accessed data and said query and returns to said user accessed data having a predetermined degree of relevance .	"predetermined degree of relevance" See 3[b] above	"predetermined degree of relevance" See 3[b] above	
13. A non-relational, distributed database system having an information retrieval tool for handling queries from a	"non-relational, distributed database system" See 1 above	"non-relational, distributed database system" See 1 above	

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user, comprising:			
<p>13[a] a plurality of home nodes; and</p> <p>13[b] a plurality of query nodes, said plurality of home nodes and said plurality of query nodes connected by a network,</p>	<p>“a plurality of home nodes; and a plurality of query nodes, said plurality of home nodes and said plurality of query nodes connected by a network” See 1 above</p>	<p>“a plurality of home nodes; and a plurality of query nodes, said plurality of home nodes and said plurality of query nodes connected by a network” See 1 above</p>	
<p>13[c] each said home node, upon receiving a command from a user, enqueueing a predetermined task in response to said command, a query task enqueued being resultant in, in response to a query command from said user, fragmenting a query contained in said query command into a plurality of query fragments, hashing each said query fragment of said plurality of query fragments into a hashed query fragment having a first portion and a second portion, and transmitting a query message containing each said hashed query fragment to a respective one of said</p>	<p>“query fragment” See 1[b] above</p> <p>“hashing” See 1[c] above</p> <p>“a first portion and a second portion” See 1[c] above</p> <p>“transmitting a query message containing each said hashed query fragment to a respective one of said plurality of query nodes indicated by said first portion of said hashed query fragment” See 1[d] above</p>	<p>“query fragment” See 1[b] above</p> <p>“hashing” See 1[c] above</p> <p>“a first portion and a second portion” See 1[c] above</p> <p>“transmitting a query message containing each said hashed query fragment to a respective one of said plurality of query nodes indicated by said first portion of said hashed query fragment” See 1[d] above</p>	

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<p>plurality of query nodes indicated by said first portion of said hashed query fragment,</p>			
<p>13[d] said query node, upon receipt of said query message, using said second portion of said hashed query fragment to access data according to a local hash table located on said query node and transmitting a message returning an object identifier corresponding to said accessed data to said home node.</p>	<p>“said query node, upon receipt of said query message, using said second portion of said hashed query fragment to access data according to a local hash table located on said query node” See 1[e] (“using...”) above</p> <p>“local hash table” See 1[e] above</p> <p>“said query node...returning” See 1[f] (“returning...”) above</p>	<p>“said query node, upon receipt of said query message, using said second portion of said hashed query fragment to access data according to a local hash table located on said query node” See 1[e] (“using...”) above</p> <p>“local hash table” See 1[e] above</p> <p>“said query node...returning” See 1[f] (“returning...”) above</p>	