EXHIBIT A

SUMMARY OF DISPUTED TERMS

Claim	Disputed Claim Term	Defendants' Proposed	Bedrock's Proposed	Court's Construction
Numbers	or Phrase	Construction	Construction	
1, 3, 5, 7	linked list to store and provide access to records / linked list of records	[AGREED]	[AGREED]	A list, capable of containing two or more records, in which each record contains a pointer to the next record or information indicating that there is no next record.
5, 7	external chaining	[AGREED]	[AGREED]	a technique for resolving hash collisions using a linked list(s)
1, 3, 5, 7	automatically expiring / expired	Becoming obsolete and no longer needed in the storage system by comparing some portion of the contents of the record to some external condition / obsolete and no longer needed or desired in the storage system based on a comparison of some portion of the contents of the record to some external condition.	After a limited period of time or after the occurrence of some event, becoming obsolete and therefore no longer needed or desired in the storage system / obsolete and therefore no longer needed or desired in the storage system.	
1, 3, 5, 7	identifying [and] removing when the linked list is accessed	Both identification and removal of the automatically expired record(s) occurs during the same traversal of the linked list.	Bedrock believes that this term language is properly construed pursuant to 35 U.S.C. § 112(6).	
1, 3, 5, 7	removing at least some of the [expired ones of the records/automatically expired records] from the linked list [of	While traversing the linked list, both adjusting the pointers in the linked list to bypass the previously identified expired records and deallocating the memory occupied by those	Bedrock believes that this term language is properly construed pursuant to 35 U.S.C. § 112(6).	

Claim	Disputed Claim Term	Defendants' Proposed	Bedrock's Proposed	Court's Construction
Numbers	or Phrase	Construction	Construction	
	records] when the	records.		
	linked list is accessed			
1, 3, 5, 7	identifying	[AGREED]	[AGREED]	No construction necessary.
5	a hashing means to	Indefinite	Function: The recited function	
	provide access to		is using hashing to provide	
	records stored in a		access to records stored in a	
	memory of the system		memory of the system and	
	and using an external		using an external chaining	
	chaining technique to		technique to store the records	
	store the records with		with same hash address, at least	
	same hash address, at		some of the records	
	least some of the		automatically expiring.	
	records automatically			
	expiring		Structure: The <u>corresponding</u>	
			structure is: (1) Portions of the	
			application software, user	
			access software or operating	
			system software, as described at	
			col. 4, lines 30-48 and	
			illustrated in FIG. 2, of a	
			computer system that includes	
			at least a CPU 10 and RAM 11,	
			see FIG. 1 and col. 3 lines 52-	
			56; and (2) Executable software	
			instructions corresponding to	
			pseudo-code "var table: array [0	
			table_size - 1] of	
			list_element_pointer /* Hash	
			table.*/" which point to records	
			of type "list_element" in cols.	
			9-10 that allocates in memory	

Claim	Disputed Claim Term	Defendants' Proposed	Bedrock's Proposed	Court's Construction
Numbers	or Phrase	Construction	Construction	
			an external chaining hash table,	
			and/or as described in col. 5,	
			lines 16-41, or the equivalents	
			thereof.	
1, 5	a record search means	Indefinite	Function: The recited function	
	utilizing a search key		is record searching utilizing a	
	to access the linked		search key to access the linked	
	list		list.	
			Structure: The <u>corresponding</u>	
			structure is: (1) Portions of the	
			application software, user	
			access software or operating	
			system software, as described at	
			col. 4, lines 30-48 and	
			illustrated in FIG. 2, of a	
			computer system that includes	
			at least a CPU 10 and RAM 11,	
			see FIG. 1 and col. 3 lines 52	
			56; and (2) Executable software	
			instructions as illustrated in	
			Boxes 31-36 and Boxes 39-41	
			of FIG. 3, or as portions of the	
			pseudo-code of Search Table	
			Procedure (cols. 11 and 12) or	
			Alternate Version of Search	
			Table Procedure (cols. 11, 12,	
			13, and 14), and described in	
			col. 5, line 57-col. 6 line 4 and	
			col. 6 lines 15-20, or the	
			equivalents thereof.	

Claim	Disputed Claim Term	Defendants' Proposed	Bedrock's Proposed	Court's Construction	
Numbers	or Phrase	Construction	Construction	Court's Constituction	
1, 5	the record search	Function: identifying and	Function: record searching		
	means including a	removing at least some [of the]	including identifying and		
	means for identifying	expired ones of the records	removing at least some of the		
	and removing at least	from the linked list [of records]	expired ones of the records		
	some of the expired	when the linked list is accessed.	from the linked list when the		
	ones of the records		linked list is accessed.		
	from the linked list	For the construction of this			
	when the linked list is	function, see proposed	Structure: (1) Portions of the		
	accessed	constructions above, as further	application software, user		
		described in Joint Claim	access software or operating		
		Construction Statement [Dkt.	system software, as described at		
		251].	col. 4, lines 30-48 and		
			illustrated in FIG. 2, of a		
		Structure: Boxes 10 and 11 of	computer system that includes		
		Fig. 1, Boxes 38 and 42 of Fig.	at least a CPU 10 and RAM 11,		
		3, Fig 4, pseudocode in the	see FIG. 1 and col. 3 lines 52-		
		Search Procedure (cols. 11-14)	56. (2) Executable software as		
		and Remove Procedure (cols.	described in Boxes 33-42 of		
		13-14), and corresponding	FIG. 3, and/or as pseudo-code		
		portions of the specification.	in the Search Table Procedure		
			(cols. 11 and 12) or Alternate		
			Version of Search Table		
			Procedure (cols. 11-14) starting		
			at the line "while /*HEART		
			OF THE TECHNIQUE" and		
			ending at the end of each		
			procedure, and/or as described		
			in col. 5, line 63 - col. 6, line		
1.5		F	34, or the equivalents thereof.		
1, 5	means, utilizing the	Function: utilizing the record	Function: utilizing the record		
	record search means,	search means, [accessing the	search means, accessing the		

Claim	Disputed Claim Term Defendants' Proposed		Bedrock's Proposed	Court's Construction
Numbers	or Phrase	Construction	Construction	
	for [accessing the	linked list / inserting, retrieving,	linked list and, at the same time,	
	linked list/inserting,	and deleting from the system]	removing at least some of the	
	retrieving, and	and, at the same time, removing	expired ones of the records in	
	deleting records from	at least some of the expired	the linked list.	
	the system] and, at the	ones of the records in the linked		
	same time, removing	list.	Structure : (1) Portions of the	
	at least some of the		application software, user	
	expired ones of the	"At the same time" means	access software or operating	
	records in the	during the same traversal of the	system software, as described at	
	[accessed] linked list	linked list as [accessing the	col. 4, lines 30-48 and	
	[of records]	linked list / inserting, retrieving,	illustrated in FIG. 2, of a	
		and deleting records from the	computer system that includes	
		system].	at least a CPU 10 and RAM 11,	
			see FIG. 1 and col. 3 lines 52-	
		For the construction of	56. (2) Executable software	
		"removing", see proposed	which provides the insert,	
		construction above, as further	retrieve, or delete record	
		described in Joint Claim	capability illustrated in the	
		Construction Statement [Dkt.	flowchart of FIG. 5, FIG. 6, or	
		251].	FIG. 7, respectively, and/or as	
		G	pseudo code of Insert Procedure	
		Structure: Boxes 10 and 11 of	(cols. 9 and 10), Retrieve	
		Fig. 1; Figs. 4-7, pseudocode in	Procedure (cols. 9, 10, 11, and	
		the Search Procedure (cols. 11-	12), or Delete Procedure (cols.	
		14), Insert Procedure (cols. 9	11 and 12), respectively, and/or	
		and 10), Retrieve Procedure	described in col. 7, line 65 - col.	
		(cols. 9 and 10), Delete	8, line 32, col. 8, lines 33-44, or	
		Procedure (cols. 11-12), and Remove Procedure (cols. 13-	col. 8 lines 45-59, or the	
		`	equivalents thereof.	
		14), and corresponding portions		
		of the specification.		

Claim	Disputed Claim Term	Defendants' Proposed	Bedrock's Proposed	Court's Construction
Numbers	or Phrase	Construction	Construction	
		Inserting, retrieving, and deleting are all required.		
4, 8	dynamically determining maximum number [of expired ones of the records to remove/for the record search means to remove]	Immediately before the linked list is traversed, determining a single number that serves as an upper limit on the number of records to remove while the linked list is traversed	Determining, during program execution, maximum number of expired ones of the records to remove when the linked list is accessed	
	when the linked list is accessed	OR Prior to traversing the linked list, determining a single quantity that serves as an upper limit on the number of expired records to remove, where the determination is based on	In response to Defendants' proposed construction of "Prior information system", after post-Markman discussions with the Defendants the following:	
		factors such as how much memory is available in the system storage pool, general system load, time of day, and the number of records currently residing in the information system.	For claim 4, "the step of method claim 4 is performed before the removing step of claim 3, that is the object of determination." For Claim 8, "the step of method claim 8 is performed before the removing step of	
			claim 7, that is the object of determination."	
2, 6	means for dynamically determining	Indefinite	Function: The recited function is dynamically determining maximum number of records	

Claim	Disputed Claim Term	Defendants' Proposed	Bedrock's Proposed	Court's Construction
Numbers	or Phrase	Construction	Construction	
	maximum number for		for the record search means to	
	the record search		remove in the accessed linked	
	means to remove		list of records.	
	when the linked list is			
	accessed		Structure: The corresponding	
			structure is: (1) Portions of the	
			application software, user	
			access software or operating	
			system software, as described at	
			col. 4, lines 30-48 and	
			illustrated in FIG. 2, of a	
			computer system that includes	
			at least a CPU 10 and RAM 11,	
			see FIG. 1 and col. 3 lines 52-	
			56; and (2) Executable	
			software, as described in col. 6,	
			line 56 - col. 7, line 15, that	
			dynamically chooses among	
			removal strategies (e.g.,	
			chooses whether to execute	
			Search Table Procedure [cols.	
			11-12] or Alternate Version of	
			Search Table Procedure [cols.	
			11-14]) "at the time the record	
			search means is invoked by the	
			caller, thus sometimes	
			removing all expired records, at	
			other times removing some but	
			not all of them, and yet at other	
			times choosing to remove none	
			of them. Such a dynamic	

Claim	Disputed Claim Term	Defendants' Proposed	Bedrock's Proposed	Court's Construction
Numbers	or Phrase	Construction	Construction	
			decision can be based on factors	
			such as, for example, how much	
			memory is available in the	
			system storage pool, general	
			system load, time of day, the	
			number of records currently	
			residing in the information	
			system, and other factors both	
			internal and external to the	
			information storage and	
			retrieval system itself" (col. 7,	
			lines 1-10), or the equivalent	
			thereof.	
3	Ordering of Method	The elements of claim 3 must	No construction needed.	
	Claims	be executed in order.		
			If the Court is inclined to	
		Moreover, "when the linked list	address this issue, then it should	
		is accessed" in the removing	hold that the steps of claim 3	
		step refers to the accessing step,	may be performed in a	
		and the identifying and	consecutive manner, in a	
		removing steps must	repeating manner, in an	
		occur during the same traversal of the linked list of records.	overlapping manner, or a combination of the three.	
7	Ordering of Mathed	The elements of claim 7 must	No construction needed.	
'	Ordering of Method Claim	be executed in order.	no construction needed.	
	Ciaiiii	be executed in order.	If the Court is inclined to	
		Moreover, "when the linked list	address this issue, then it should	
		is accessed" in the removing	hold that the steps of claim 7	
		step refers to the accessing step,	may be performed in a	
		and the identifying and	consecutive manner, in a	
			repeating manner, in an	
		removing steps must	repeating manner, in an	

Claim	Disputed Claim Term	Defendants' Proposed	Bedrock's Proposed	Court's Construction
Numbers	or Phrase	Construction	Construction	
		occur during the same traversal of the linked list of records.	overlapping manner, or a combination of the three, except that the ultimate step of claim 7 must follow or at least partially follow the penultimate step of claim 7.	

UPDATED CLAIM CONSTRUCTION CHART

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
	Term or Phrase	Construction	Construction	Construction
1. An information	linked list to store	[AGREED]	[AGREED]	A list, capable of
storage and retrieval	and provide access to			containing two or
system, the system	records			more records, in
comprising:				which each record
				contains a pointer
a linked list to store				to the next record
and provide access to				or information
records stored in a				indicating that
memory of the system,				there is no next
at least some of the				record.
records automatically	automatically	Becoming obsolete and	After a limited period of time or	
expiring,	expiring / expired	no longer needed in the	after the occurrence of some	
		storage system by	event, becoming obsolete and	
a record search means		comparing some portion	therefore no longer needed or	
utilizing a search key		of the contents of the	desired in the storage system /	
to access the linked list,		record to some external	obsolete and therefore no	
		condition / obsolete and	longer needed or desired in the	
the record search		no longer needed or	storage system.	
means including a		desired in the storage		
means for identifying		system based on a		
and removing at least		comparison of some		
some of the expired		portion of the contents of		
ones of the records		the record to some		
from the linked list		external condition.		
when the linked list is	identifying and	Both identification and	Bedrock believes that this term	
accessed, and	removing at least	removal of the	language is properly construed	
	some of the expired	automatically expired	pursuant to 35 U.S.C. § 112(6).	
means, utilizing the	ones of the records	record(s) occurs during		
record search means,	from the linked list	the same traversal of the		

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
•	Term or Phrase	Construction	Construction	Construction
for accessing the linked	when the linked list	linked list.		
list and, at the same	is accessed			
time, removing at least	identifying and	While traversing the	Bedrock believes that this term	
some of the expired	removing at least	linked list, both adjusting	language is properly construed	
ones of the records in	some of the expired	the pointers in the linked	pursuant to 35 U.S.C. § 112(6).	
the linked list.	ones of the records	list to bypass the		
	from the linked list	previously identified		
	when the linked list	expired records and		
	is accessed	deallocating the memory		
		occupied by those		
		records.		
	identifying and	[AGREED]	[AGREED]	No construction
	removing at least			necessary.
	some of the expired			
	ones of the records			
	from the linked list			
	when the linked list			
	is accessed	7 1 0 1		
	a record search	Indefinite	Function: The <u>recited function</u>	
	means utilizing a		is record searching utilizing a	
	search key to access		search key to access the linked	
	the linked list		list.	
			Structure: The corresponding structure is: (1) Portions of the application software, user access software or operating system software, as described at col. 4, lines 30-48 and illustrated in FIG. 2, of a computer system that includes	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
	Term or Phrase	Construction	Construction	Construction
			at least a CPU 10 and RAM 11,	
			see FIG. 1 and col. 3 lines 52	
			56; and (2) Executable software	
			instructions as illustrated in	
			Boxes 31-36 and Boxes 39-41	
			of FIG. 3, or as portions of the	
			pseudo-code of Search Table	
			Procedure (cols. 11 and 12) or	
			Alternate Version of Search	
			Table Procedure (cols. 11, 12,	
			13, and 14), and described in	
			col. 5, line 57-col. 6 line 4 and	
			col. 6 lines 15-20, or the	
			equivalents thereof.	
	the record search	Function : identifying and	Function: record searching	
	means including a	removing at least some	including identifying and	
	means for	[of the] expired ones of	removing at least some of the	
	identifying and	the records from the	expired ones of the records	
	removing at least	linked list [of records]	from the linked list when the	
	some of the expired	when the linked list is	linked list is accessed.	
	ones of the records	accessed.		
	from the linked list		Structure: (1) Portions of the	
	when the linked list	For the construction of	application software, user	
	is accessed	this function, see	access software or operating	
		proposed constructions	system software, as described at	
		above, as further	col. 4, lines 30-48 and	
		described in Joint Claim	illustrated in FIG. 2, of a	
		Construction Statement	computer system that includes	
		[Dkt. 251].	at least a CPU 10 and RAM 11, see FIG. 1 and col. 3 lines 52-	
		Standard David 10 and		
		Structure : Boxes 10 and	56. (2) Executable software as	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
•	Term or Phrase	Construction	Construction	Construction
		11 of Fig. 1, Boxes 38	described in Boxes 33-42 of	
		and 42 of Fig. 3, Fig 4,	FIG. 3, and/or as pseudo-code	
		pseudocode in the Search	in the Search Table Procedure	
		Procedure (cols. 11-14)	(cols. 11 and 12) or Alternate	
		and Remove Procedure	Version of Search Table	
		(cols. 13-14), and	Procedure (cols. 11-14) starting	
		corresponding portions of	at the line "while /*HEART	
		the specification.	OF THE TECHNIQUE" and	
			ending at the end of each	
			procedure, and/or as described	
			in col. 5, line 63 - col. 6, line	
			34, or the equivalents thereof.	
	means, utilizing the	Function: utilizing the	Function : utilizing the record	
	record search means,	record search means,	search means, accessing the	
	for accessing the	[accessing the linked list /	linked list and, at the same	
	linked list and, at the	inserting, retrieving, and	time, removing at least some of	
	same time, removing	deleting from the system]	the expired ones of the records	
	at least some of the	and, at the same time,	in the linked list.	
	expired ones of the	removing at least some of		
	records in the linked	the expired ones of the	Structure : (1) Portions of the	
	list	records in the linked list.	application software, user	
			access software or operating	
		"At the same time" means	system software, as described at	
		during the same traversal	col. 4, lines 30-48 and	
		of the linked list as	illustrated in FIG. 2, of a	
		[accessing the linked list /	computer system that includes	
		inserting, retrieving, and	at least a CPU 10 and RAM 11,	
		deleting records from the	see FIG. 1 and col. 3 lines 52-	
		system].	56. (2) Executable software	
			which provides the insert,	
		For the construction of	retrieve, or delete record	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
Disputed Cidinis	Term or Phrase	Construction	Construction	Construction
		"removing", see proposed construction above, as further described in Joint Claim Construction Statement [Dkt. 251]. Structure: Boxes 10 and 11 of Fig. 1; Figs. 4-7, pseudocode in the Search Procedure (cols. 11-14), Insert Procedure (cols. 9 and 10), Retrieve Procedure (cols. 9 and 10), Delete Procedure (cols. 11-12), and Remove Procedure (cols. 13-14), and corresponding portions of the specification. Inserting, retrieving, and deleting are all required.	capability illustrated in the flowchart of FIG. 5, FIG. 6, or FIG. 7, respectively, and/or as pseudo code of Insert Procedure (cols. 9 and 10), Retrieve Procedure (cols. 9, 10, 11, and 12), or Delete Procedure (cols. 11 and 12), respectively, and/or described in col. 7, line 65 - col. 8, line 32, col. 8, lines 33-44, or col. 8 lines 45-59, or the equivalents thereof.	
2. The information storage and retrieval system according to	dynamically determining maximum number	Immediately before the linked list is traversed, determining a single	Bedrock believes that this term language is properly construed pursuant to 35 U.S.C. § 112(6).	
claim 1 further including means for dynamically determining maximum	for the record search means to remove when the linked list	number that serves as an upper limit on the number of records to remove		
number for the record search means to	is accessed	while the linked list is traversed		

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
	Term or Phrase	Construction	Construction	Construction
remove in the accessed linked list of records.		OR		
		Prior to traversing the linked list, determining a single quantity that serves as an upper limit on the number of expired records to remove, where the determination is based on factors such as how much memory is available in the system storage pool, general system load, time of day, and the number of records currently residing in the information system.		
	means for	Indefinite	Function: The recited function	
	dynamically		is dynamically determining	
	determining		maximum number of records	
	maximum number		for the record search means to	
	for the record search		remove in the accessed linked	
	means to remove when the linked list		list of records.	
	is accessed		Structure: The corresponding	
	15 accessed		structure is: (1) Portions of the	
			application software, user	
			access software or operating	
			system software, as described at	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
•	Term or Phrase	Construction	Construction	Construction
			col. 4, lines 30-48 and	
			illustrated in FIG. 2, of a	
			computer system that includes	
			at least a CPU 10 and RAM 11,	
			see FIG. 1 and col. 3 lines 52-	
			56; and (2) Executable	
			software, as described in col. 6,	
			line 56 - col. 7, line 15, that	
			dynamically chooses among	
			removal strategies (e.g.,	
			chooses whether to execute	
			Search Table Procedure [cols.	
			11-12] or Alternate Version of	
			Search Table Procedure [cols.	
			11-14]) "at the time the record	
			search means is invoked by the	
			caller, thus sometimes	
			removing all expired records, at	
			other times removing some but	
			not all of them, and yet at other	
			times choosing to remove none	
			of them. Such a dynamic	
			decision can be based on	
			factors such as, for example,	
			how much memory is available	
			in the system storage pool,	
			general system load, time of	
			day, the number of records	
			currently residing in the	
			information system, and other	
			factors both internal and	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
-	Term or Phrase	Construction	Construction	Construction
			external to the information	
			storage and retrieval system	
			itself" (col. 7, lines 1-10), or the	
			equivalent thereof.	
3. A method for storing	linked list to store	[AGREED]	[AGREED]	A list, capable of
and retrieving	and provide access to			containing two or
information records	the records			more records, in
using a linked list to				which each record
store and provide				contains a pointer
access to the records, at				to the next record
least some of the records				or information
automatically expiring,				indicating that
the method comprising				there is no next
the steps of:				record.
	automatically	Becoming obsolete and	After a limited period of time or	
accessing the linked list	expiring / expired	no longer needed in the	after the occurrence of some	
of records,		storage system by	event, becoming obsolete and	
		comparing some portion	therefore no longer needed or	
identifying at least		of the contents of the	desired in the storage system /	
some of the		record to some external	obsolete and therefore no	
automatically expired		condition / obsolete and	longer needed or desired in the	
ones of the records,		no longer needed or	storage system.	
and		desired in the storage		
_		system based on a		
removing at least some		comparison of some		
of the automatically		portion of the contents of		
expired records from		the record to some		
the linked list when the		external condition.		
linked list is accessed.	identifying at least	Both identification and	No Construction Necessary.	
	some of the	removal of the		
	automatically	automatically expired		

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
. .	Term or Phrase	Construction	Construction	Construction
	expired ones of the	record(s) occurs during		
	records, and	the same traversal of the		
		linked list.		
	removing at least			
	some of the			
	automatically			
	expired records from			
	the linked list when			
	the linked list is			
	accessed.			
	removing at least	While traversing the	No construction necessary;	
	some of the	linked list, both adjusting	however, should the Court	
	automatically	the pointers in the linked	construe this term: "removing	
	expired records from	list to bypass the	at least some of the	
	the linked list when	previously identified	automatically expiring records	
	the linked list is	expired records and	from the linked list when the	
	accessed	deallocating the memory	linked list is accessed for a	
		occupied by those	purpose other than garbage	
		records.	collection, using the same	
			linked list traversal performed	
			for the purpose other than	
			garbage collection."	
	identifying at least	[AGREED]	[AGREED]	No construction
	some of the			necessary.
	automatically			
	expired ones of the			
	records	TD1 1		
	Ordering of Method	The elements of claim 3	No construction needed.	
	Claim Steps	must be executed in		
		order.	If the Court is inclined to	
			address this issue, then it	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
•	Term or Phrase	Construction	Construction	Construction
		Moreover, "when the linked list is accessed" in the removing step refers to the accessing step, and the identifying and removing steps must occur during the same traversal of the linked list of records.	should hold that the steps of claim 3 may be performed in a consecutive manner, in a repeating manner, in an overlapping manner, or a combination of the three.	
4. The method according to claim 3 further including the step of dynamically determining maximum number of expired ones of the records to remove when the linked list is accessed.	dynamically determining maximum number of expired ones of the records to remove when the linked list is accessed	Immediately before the linked list is traversed, determining a single number that serves as an upper limit on the number of records to remove while the linked list is traversed	Determining, during program execution, maximum number of expired ones of the records to remove when the linked list is accessed	
		Prior to traversing the linked list, determining a single quantity that serves as an upper limit on the number of expired records to remove, where the determination is based on factors such as how much memory is available in the system storage pool, general	In response to Defendants' proposed construction of "Prior information system", after post-Markman discussions with the Defendants the following: For claim 4, "the step of method claim 4 is performed before the removing step of claim 3, that is the object of determination."	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
•	Term or Phrase	Construction	Construction	Construction
		system load, time of day, and the number of records currently residing in the information system.		
5. An information storage and retrieval system, the system comprising:	external chaining	[AGREED]	[AGREED]	a technique for resolving hash collisions using a linked list(s)
a hashing means to provide access to records stored in a memory of the system and using an external chaining technique to store the records with same hash address, at least some of the	linked list of records	[AGREED]	[AGREED]	A list, capable of containing two or more records, in which each record contains a pointer to the next record or information indicating that there is no next record.
records automatically expiring, a record search means utilizing a search key to access a linked list of records having the same hash address, the record search means including means for identifying and	automatically expiring / expired	Becoming obsolete and no longer needed in the storage system by comparing some portion of the contents of the record to some external condition / obsolete and no longer needed or desired in the storage system based on a comparison of some portion of the contents of	After a limited period of time or after the occurrence of some event, becoming obsolete and therefore no longer needed or desired in the storage system / obsolete and therefore no longer needed or desired in the storage system.	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
	Term or Phrase	Construction	Construction	Construction
removing at least some		the record to some		
expired ones of the		external condition.		
records from the	identifying and	Both identification and	Bedrock believes that this term	
linked list of records	removing at least	removal of the	language is properly construed	
when the linked list is	some expired ones of	automatically expired	pursuant to 35 U.S.C. § 112(6).	
accessed, and	the records from the	record(s) occurs during		
	linked list of records	the same traversal of the		
mea[n]s, utilizing the	when the linked list	linked list.		
record search means,	is accessed			
for inserting,	identifying and	While traversing the	Bedrock believes that this term	
retrieving, and deleting	removing at least	linked list, both adjusting	language is properly construed	
records from the	some expired ones of	the pointers in the linked	pursuant to 35 U.S.C. § 112(6).	
system and, at the	the records from the	list to bypass the		
same time, removing at	linked list of records	previously identified		
least some expired ones	when the linked list	expired records and		
of the records in the	is accessed	deallocating the memory		
accessed linked list of		occupied by those		
records.		records.		
	identifying and	[AGREED]	[AGREED]	No construction
	removing at least			necessary.
	some expired ones of			
	the records from the			
	linked list of records			
	when the linked list			
	is accessed			
	a hashing means to	Indefinite	Function: The <u>recited function</u>	
	provide access to		is using hashing to provide	
	records stored in a		access to records stored in a	
	memory of the		memory of the system and	
	system and using an		using an external chaining	
	external chaining		technique to store the records	

Disputed Claims Disputed Claim Term or Phrase technique to store the records with same hash address, at least some of the records automatically	-	
technique to store the records with same hash address, at least some of the records	on Construction (Court's Construction
same hash address, at least some of the records	with same hash address, at least	
at least some of the records	some of the records	
records	automatically expiring.	
automatically	Structure: The <u>corresponding</u>	
I • • I	structure is: (1) Portions of the	
expiring	application software, user	
	access software or operating	
	system software, as described at	
	col. 4, lines 30-48 and	
	illustrated in FIG. 2, of a	
	computer system that includes	
	at least a CPU 10 and RAM 11,	
	see FIG. 1 and col. 3 lines 52-	
	56; and (2) Executable software	
	instructions corresponding to	
	pseudo-code "var table: array [0	
	table_size - 1] of	
	list_element_pointer /* Hash	
	table.*/" which point to records	
	of type "list_element" in cols.	
	9-10 that allocates in memory	
	an external chaining hash table,	
	and/or as described in col. 5,	
	lines 16-41, or the equivalents thereof.	
a record search Indefinite	Function: The recited function	
means utilizing a	is record searching utilizing a	
search key to access	search key to access a linked	
a linked list of	list of records having the same	
records having the	hash address.	

Disputed Claims Disputed 0	Claim	Defendants' Proposed	Bedrock's Proposed	Court's
Term or P		Construction	Construction	Construction
same hash ad	ldress			
			Structure: The corresponding	
			structure is: (1) Portions of the	
			application software, user	
			access software or operating	
			system software, as described at	
			col. 4, lines 30-48 and	
			illustrated in FIG. 2, of a	
			computer system that includes	
			at least a CPU 10 and RAM 11,	
			see FIG. 1 and col. 3 lines 52	
			56; and (2) Executable software	
			instructions as illustrated in	
			Boxes 31-36 and Boxes 39-41	
			of FIG. 3, or as portions of the	
			pseudo-code of Search Table	
			Procedure (cols. 11 and 12) or	
			Alternate Version of Search	
			Table Procedure (cols. 11, 12,	
			13, and 14), and described in	
			col. 5, line 57-col. 6 line 4 and	
			col. 6 lines 15-20, or the	
41-0	a walk	Function, identifying and	equivalents thereof.	
the record se		Function : identifying and	Function: record searching	
means includ means for	ing a	removing at least some	including identifying and	
identifying a	ad	[of the] expired ones of the records from the	removing at least some of the expired ones of the records	
removing at l		linked list [of records]	from the linked list when the	
some expired		when the linked list is	linked list is accessed.	
the records fi		accessed.	mircu iist is accessed.	
linked list of		accessed.	Structure: (1) Portions of the	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
•	Term or Phrase	Construction	Construction	Construction
	when the linked list	For the construction of	application software, user	
	is accessed	this function, see	access software or operating	
		proposed constructions	system software, as described at	
		above, as further	col. 4, lines 30-48 and	
		described in Joint Claim	illustrated in FIG. 2, of a	
		Construction Statement	computer system that includes	
		[Dkt. 251].	at least a CPU 10 and RAM 11,	
			see FIG. 1 and col. 3 lines 52-	
		Structure : Boxes 10 and	56. (2) Executable software as	
		11 of Fig. 1, Boxes 38	described in Boxes 33-42 of	
		and 42 of Fig. 3, Fig 4,	FIG. 3, and/or as pseudo-code	
		pseudocode in the Search	in the Search Table Procedure	
		Procedure (cols. 11-14)	(cols. 11 and 12) or Alternate	
		and Remove Procedure	Version of Search Table	
		(cols. 13-14), and	Procedure (cols. 11-14) starting	
		corresponding portions of	at the line "while /*HEART	
		the specification.	OF THE TECHNIQUE" and	
			ending at the end of each	
			procedure, and/or as described	
			in col. 5, line 63 - col. 6, line	
			34, or the equivalents thereof.	
	mea[n]s, utilizing the	Function : utilizing the	Function : utilizing the record	
	record search means,	record search means,	search means, inserting,	
	for inserting,	[accessing the linked list /	retrieving, and deleting records	
	retrieving, and	inserting, retrieving, and	from the system and, at the	
	deleting records	deleting from the system]	same time, removing at least	
	from the system and,	and, at the same time,	some expired ones of the	
	at the same time,	removing at least some of	records in the accessed linked	
	removing at least	the expired ones of the	list of records.	
	some expired ones of	records in the linked list.		
	the records in the		Structure : (1) Portions of the	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
Zispatta Cimilio	Term or Phrase	Construction	Construction	Construction
	accessed linked list	"At the same time" means	application software, user	
	of records.	during the same traversal	access software or operating	
		of the linked list as	system software, as described at	
		[accessing the linked list /	col. 4, lines 30-48 and	
		inserting, retrieving, and	illustrated in FIG. 2, of a	
		deleting records from the	computer system that includes	
		system].	at least a CPU 10 and RAM 11,	
			see FIG. 1 and col. 3 lines 52-	
		For the construction of	56. (2) Executable software	
		"removing", see	which provides the insert,	
		proposed construction	retrieve, or delete record	
		above, as further	capability illustrated in the	
		described in Joint Claim	flowchart of FIG. 5, FIG. 6, or	
		Construction Statement	FIG. 7, respectively, and/or as	
		[Dkt. 251].	pseudo code of Insert Procedure	
		G((cols. 9 and 10), Retrieve	
		Structure: Boxes 10 and	Procedure (cols. 9, 10, 11, and	
		11 of Fig. 1; Figs. 4-7,	12), or Delete Procedure (cols.	
		pseudocode in the Search	11 and 12), respectively, and/or	
		Procedure (cols. 11-14), Insert Procedure (cols. 9	described in col. 7, line 65 - col.	
		and 10), Retrieve	8, line 32, col. 8, lines 33-44, or col. 8 lines 45-59, or the	
		Procedure (cols. 9 and	equivalents thereof.	
		10), Delete Procedure	equivalents thereor.	
		(cols. 11-12), and		
		Remove Procedure (cols.		
		13-14), and		
		corresponding portions of		
		the specification.		
		and specification.		
		Inserting, retrieving, and		

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
•	Term or Phrase	Construction	Construction	Construction
		deleting are all required.		
6. The information	dynamically	Immediately before the	Bedrock believes that this term	
storage and retrieval	determining	linked list is traversed,	language is properly construed	
system according to	maximum number	determining a single	pursuant to 35 U.S.C. § 112(6).	
claim 5 further including	for the record search	number that serves as an		
means for dynamically	means to remove in	upper limit on the number		
determining maximum	the accessed linked	of records to remove		
number for the record	list of records	while the linked list is		
search means to		traversed		
remove in the accessed				
linked list of records.		OR		
		Prior to traversing the		
		linked list, determining a		
		single quantity that serves		
		as an upper limit on the		
		number of expired		
		records to remove, where		
		the determination is based		
		on factors such as how		
		much memory is		
		available in the system		
		storage pool, general		
		system load, time of day,		
		and the number of		
		records currently residing in the information		
	means for	system. Indefinite	Function: The recited function	
		Indefinite		
	dynamically		is dynamically determining maximum number of records	
	determining		maximum number of records	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
Ziopatta Ciamis	Term or Phrase	Construction	Construction	Construction
	maximum number		for the record search means to	
	for the record search		remove in the accessed linked	
	means to remove		list of records.	
	when the linked list			
	is accessed		Structure: The corresponding	
			structure is: (1) Portions of the	
			application software, user	
			access software or operating	
			system software, as described at	
			col. 4, lines 30-48 and	
			illustrated in FIG. 2, of a	
			computer system that includes	
			at least a CPU 10 and RAM 11,	
			see FIG. 1 and col. 3 lines 52-	
			56; and (2) Executable	
			software, as described in col. 6,	
			line 56 - col. 7, line 15, that	
			dynamically chooses among	
			removal strategies (e.g.,	
			chooses whether to execute	
			Search Table Procedure [cols.	
			11-12] or Alternate Version of	
			Search Table Procedure [cols.	
			11-14]) "at the time the record	
			search means is invoked by the	
			caller, thus sometimes	
			removing all expired records, at	
			other times removing some but	
			not all of them, and yet at other	
			times choosing to remove none	
			of them. Such a dynamic	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
•	Term or Phrase	Construction	Construction	Construction
			decision can be based on	
			factors such as, for example,	
			how much memory is available	
			in the system storage pool,	
			general system load, time of	
			day, the number of records	
			currently residing in the	
			information system, and other	
			factors both internal and	
			external to the information	
			storage and retrieval system	
			itself" (col. 7, lines 1-10), or the	
			equivalent thereof.	
7. A method for storing	external chaining	[AGREED]	[AGREED]	a technique for
and retrieving				resolving hash
information records				collisions using a
using a hashing				linked list(s)
technique to provide	linked list of records	[AGREED]	[AGREED]	A list, capable of
access to the records and				containing two or
using an external				more records, in
chaining technique to				which each record
store the records with				contains a pointer
same hash address, at				to the next record
least some of the records				or information
automatically expiring,				indicating that
the method comprising				there is no next
the steps of:	4	December absolute and	After a limited manied of times an	record.
accessing a linked list of	automatically	Becoming obsolete and	After a limited period of time or	
accessing a linked list of	expiring / expired	no longer needed in the	after the occurrence of some	
records having same		storage system by	event, becoming obsolete and	
hash address,		comparing some portion	therefore no longer needed or	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
Disputed Oldinis	Term or Phrase	Construction	Construction	Construction
		of the contents of the	desired in the storage system /	
identifying at least		record to some external	obsolete and therefore no	
some of the		condition / obsolete and	longer needed or desired in the	
automatically expired		no longer needed or	storage system.	
ones of the records,		desired in the storage		
·		system based on a		
removing at least some		comparison of some		
of the automatically		portion of the contents of		
expired records from		the record to some		
the linked list when the		external condition.		
linked list is accessed,	identifying at least	Both identification and	No construction necessary.	
and	some of the	removal of the		
	automatically	automatically expired		
inserting, retrieving or	expired ones of the	record(s) occurs during		
deleting one of the	records,	the same traversal of the		
records from the system		linked list.		
following the step of	removing at least			
removing.	some of the			
	automatically			
	expired records from			
	the linked list when			
	the linked list is			
	accessed.			
	removing at least	While traversing the	No construction necessary;	
	some of the	linked list, both adjusting	however, should the Court	
	automatically	the pointers in the linked	construe this term: "removing	
	expired records from	list to bypass the	at least some of the	
	the linked list when	previously identified	automatically expiring records	
	the linked list is	expired records and	from the linked list when the	
	accessed	deallocating the memory	linked list is accessed for a	
		occupied by those	purpose other than garbage	

Disputed Claims	Disputed Claim	Defendants' Proposed	Bedrock's Proposed	Court's
Disputeu Ciumis	Term or Phrase	Construction	Construction	Construction
		records.	collection, using the same linked list traversal performed for the purpose other than garbage collection."	
	identifying at least some of the automatically expired ones of the records	[AGREED]	[AGREED]	No construction necessary.
	Ordering of Method Claim Steps	The elements of claim 7 must be executed in order. Moreover, "when the linked list is accessed" in the removing step refers to the accessing step, and the identifying and removing steps must occur during the same traversal of the linked list of records.	No construction needed. If the Court is inclined to address this issue, then it should hold that the steps of claim 7 may be performed in a consecutive manner, in a repeating manner, in an overlapping manner, or a combination of the three, except that the ultimate step of claim 7 must follow or at least partially follow the penultimate step of claim 7.	
8. The method according to claim 7 further including the step of dynamically determining maximum number of expired ones of the records to remove when the	dynamically determining maximum number of expired ones of the records to remove when the linked list is accessed	Immediately before the linked list is traversed, determining a single number that serves as an upper limit on the number of records to remove while the linked list is traversed	Determining, during program execution, maximum number of expired ones of the records to remove when the linked list is accessed	

Disputed Claims	Disputed Claim Term or Phrase	Defendants' Proposed Construction	Bedrock's Proposed Construction	Court's Construction
linked list is accessed.		OR	OR	
		Prior to traversing the linked list, determining a single quantity that serves as an upper limit on the number of expired records to remove, where	In response to Defendants' proposed construction of "Prior information system", after post-Markman discussions with the Defendants the following:	
		the determination is based on factors such as how much memory is available in the system storage pool, general system load, time of day,	For Claim 8, "the step of method claim 8 is performed before the removing step of claim 7, that is the object of determination."	
		and the number of records currently residing in the information system.		