

EXHIBIT A

SUMMARY OF DISPUTED TERMS

Claim Numbers	Disputed Claim Term or Phrase	Defendants' Proposed Construction	Bedrock's Proposed Construction	Court's 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).	

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	records] when the linked list is accessed	records.		
1, 3, 5, 7	identifying . . .	[AGREED]	[AGREED]	No construction necessary.
5	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 records automatically expiring	Indefinite	<p>Function: The <u>recited function</u> is using hashing 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 records automatically expiring.</p> <p>Structure: The <u>corresponding structure</u> 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</p>	

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			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 utilizing a search key to access the linked list	Indefinite	<p>Function: The <u>recited function</u> is record searching utilizing a search key to access the linked list.</p> <p>Structure: The <u>corresponding structure</u> 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.</p>	

Claim Numbers	Disputed Claim Term or Phrase	Defendants' Proposed Construction	Bedrock's Proposed Construction	Court's Construction
1, 5	<p>the record search means including a means for identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed</p>	<p>Function: identifying and removing at least some [of the] expired ones of the records from the linked list [of records] when the linked list is accessed.</p> <p>For the construction of this function, see proposed constructions above, as further described in Joint Claim Construction Statement [Dkt. 251].</p> <p>Structure: Boxes 10 and 11 of Fig. 1, Boxes 38 and 42 of Fig. 3, Fig 4, pseudocode in the Search Procedure (cols. 11-14) and Remove Procedure (cols. 13-14), and corresponding portions of the specification.</p>	<p>Function: record searching including identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed.</p> <p>Structure: (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. (2) Executable software as described in Boxes 33-42 of FIG. 3, and/or as pseudo-code 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 34, or the equivalents thereof.</p>	
1, 5	<p>means, utilizing the record search means,</p>	<p>Function: utilizing the record search means, [accessing the</p>	<p>Function: utilizing the record search means, accessing the</p>	

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	<p>for [accessing the linked list/inserting, retrieving, and deleting records from the system] and, at the same time, removing at least some of the expired ones of the records in the [accessed] linked list [of records]</p>	<p>linked list / inserting, retrieving, and deleting from the system] and, at the same time, removing at least some of the expired ones of the records in the linked list.</p> <p>"At the same time" means during the same traversal of the linked list as [accessing the linked list / inserting, retrieving, and deleting records from the system].</p> <p>For the construction of "removing ...", see proposed construction above, as further described in Joint Claim Construction Statement [Dkt. 251].</p> <p>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.</p>	<p>linked list and, at the same time, removing at least some of the expired ones of the records in the linked list.</p> <p>Structure: (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. (2) Executable software which provides the insert, retrieve, or delete record 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.</p>	

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		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] when the linked list is accessed	<p>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</p> <p>OR</p> <p>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.</p>	<p>Determining, during program execution, maximum number of expired ones of the records to remove when the linked list is accessed</p> <p>Or</p> <p>In response to Defendants' proposed construction of "Prior . . . information system", after post-Markman discussions with the Defendants the following:</p> <p>For claim 4, "the step of method claim 4 is performed before the removing step of claim 3, that is the object of determination."</p> <p>For Claim 8, "the step of method claim 8 is performed before the removing step of claim 7, that is the object of determination."</p>	
2, 6	means for dynamically determining	Indefinite	Function: The recited function is dynamically determining maximum number of records	

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	<p>maximum number for the record search means to remove when the linked list is accessed</p>		<p>for the record search means to remove in the accessed linked list of records.</p> <p>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</p>	

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			<p>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.</p>	
3	<p>Ordering of Method Claims</p>	<p>The elements of claim 3 must be executed in order.</p> <p>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.</p>	<p>No construction needed.</p> <p>If the Court is inclined to address this issue, then it 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.</p>	
7	<p>Ordering of Method Claim</p>	<p>The elements of claim 7 must be executed in order.</p> <p>Moreover, "when the linked list is accessed" in the removing step refers to the accessing step, and the identifying and removing steps must</p>	<p>No construction needed.</p> <p>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</p>	

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		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 Term or Phrase	Defendants' Proposed Construction	Bedrock's Proposed Construction	Court's Construction
<p>1. An information storage and retrieval system, the system comprising:</p> <p>a linked list to store and provide access to records stored in a memory of the system, at least some of the records automatically expiring,</p> <p>a record search means utilizing a search key to access the linked list,</p> <p>the record search means including a means for identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed, and</p> <p>means, utilizing the record search means,</p>	<p>linked list to store and provide access to records</p>	<p>[AGREED]</p>	<p>[AGREED]</p>	<p>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.</p>
	<p>automatically expiring / expired</p>	<p>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.</p>	<p>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.</p>	
	<p>identifying and removing at least some of the expired ones of the records from the linked list</p>	<p>Both identification and removal of the automatically expired record(s) occurs during the same traversal of the</p>	<p>Bedrock believes that this term language is properly construed pursuant to 35 U.S.C. § 112(6).</p>	

Disputed Claims	Disputed Claim Term or Phrase	Defendants' Proposed Construction	Bedrock's Proposed Construction	Court's Construction
<p>for accessing the linked list and, at the same time, removing at least some of the expired ones of the records in the linked list.</p>	<p>when the linked list is accessed</p>	<p>linked list.</p>		
	<p>identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed</p>	<p>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 records.</p>	<p>Bedrock believes that this term language is properly construed pursuant to 35 U.S.C. § 112(6).</p>	
	<p>identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed</p>	<p>[AGREED]</p>	<p>[AGREED]</p>	<p>No construction necessary.</p>
	<p>a record search means utilizing a search key to access the linked list</p>	<p>Indefinite</p>	<p>Function: The <u>recited function</u> is record searching utilizing a search key to access the linked list.</p> <p>Structure: The <u>corresponding structure</u> 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</p>	

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			<p>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.</p>	
	<p>the record search means including a means for identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed</p>	<p>Function: identifying and removing at least some [of the] expired ones of the records from the linked list [of records] when the linked list is accessed.</p> <p>For the construction of this function, see proposed constructions above, as further described in Joint Claim Construction Statement [Dkt. 251].</p> <p>Structure: Boxes 10 and</p>	<p>Function: record searching including identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed.</p> <p>Structure: (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. (2) Executable software as</p>	

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		11 of Fig. 1, Boxes 38 and 42 of Fig. 3, Fig 4, pseudocode in the Search Procedure (cols. 11-14) and Remove Procedure (cols. 13-14), and corresponding portions of the specification.	described in Boxes 33-42 of FIG. 3, and/or as pseudo-code 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 34, or the equivalents thereof.	
	means, utilizing the record search means, for accessing the linked list and, at the same time, removing at least some of the expired ones of the records in the linked list	<p>Function: utilizing the record search means, [accessing the linked list / inserting, retrieving, and deleting from the system] and, at the same time, removing at least some of the expired ones of the records in the linked list.</p> <p>"At the same time" means during the same traversal of the linked list as [accessing the linked list / inserting, retrieving, and deleting records from the system].</p> <p>For the construction of</p>	<p>Function: utilizing the record search means, accessing the linked list and, at the same time, removing at least some of the expired ones of the records in the linked list.</p> <p>Structure: (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. (2) Executable software which provides the insert, retrieve, or delete record</p>	

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		<p>“removing ...”, see proposed construction above, as further described in Joint Claim Construction Statement [Dkt. 251].</p> <p>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.</p> <p>Inserting, retrieving, and deleting are all required.</p>	<p>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.</p>	
<p>2. The information storage and retrieval system according to claim 1 further including means for dynamically determining maximum number for the record search means to</p>	<p>dynamically determining maximum number for the record search means to remove when the linked list is accessed</p>	<p>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</p>	<p>Bedrock believes that this term language is properly construed pursuant to 35 U.S.C. § 112(6).</p>	

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remove in the accessed linked list of records.		<p>OR</p> <p>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.</p>		
	<p>means for dynamically determining maximum number for the record search means to remove when the linked list is accessed</p>	<p>Indefinite</p>	<p>Function: The recited function is dynamically determining maximum number of records for the record search means to remove in the accessed linked list of records.</p> <p>Structure: The corresponding structure is: (1) Portions of the application software, user access software or operating system software, as described at</p>	

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			<p>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</p>	

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			external to the information storage and retrieval system itself" (col. 7, lines 1-10), or the equivalent thereof.	
<p>3. A method for storing and retrieving information records using a linked list to store and provide access to the records, at least some of the records automatically expiring, the method comprising the steps of:</p> <p>accessing the linked list of records,</p> <p>identifying at least some of the automatically expired ones of the records,</p> <p>and</p> <p>removing at least some of the automatically expired records from the linked list when the linked list is accessed.</p>	<p>linked list to store and provide access to the records</p>	<p>[AGREED]</p>	<p>[AGREED]</p>	<p>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.</p>
	<p>automatically expiring / expired</p>	<p>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.</p>	<p>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.</p>	
	<p>identifying at least some of the automatically</p>	<p>Both identification and removal of the automatically expired</p>	<p>No Construction Necessary.</p>	

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	<p>expired ones of the records, and</p> <p>removing at least some of the automatically expired records from the linked list when the linked list is accessed.</p>	<p>record(s) occurs during the same traversal of the linked list.</p>		
	<p>removing at least some of the automatically expired records from the linked list when the linked list is accessed</p>	<p>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 records.</p>	<p>No construction necessary; however, should the Court construe this term: "removing at least some of the automatically expiring records from the linked list when the linked list is accessed for a purpose other than garbage collection, using the same linked list traversal performed for the purpose other than garbage collection."</p>	
	<p>identifying at least some of the automatically expired ones of the records</p>	<p>[AGREED]</p>	<p>[AGREED]</p>	<p>No construction necessary.</p>
	<p>Ordering of Method Claim Steps</p>	<p>The elements of claim 3 must be executed in order.</p>	<p>No construction needed.</p> <p>If the Court is inclined to address this issue, then it</p>	

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		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 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	Determining, during program execution, maximum number of expired ones of the records to remove when the linked list is accessed OR 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."	

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		system load, time of day, and the number of records currently residing in the information system.		
<p>5. An information storage and retrieval system, the system comprising:</p> <p>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 records automatically expiring,</p> <p>a record search means utilizing a search key to access a linked list of records having the same hash address,</p> <p>the record search means including means for identifying and</p>	external chaining	[AGREED]	[AGREED]	a technique for resolving hash collisions using a linked list(s)
	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.
	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.	

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<p>removing at least some expired ones of the records from the linked list of records when the linked list is accessed, and</p> <p>mea[n]s, utilizing the record search means, for inserting, retrieving, and deleting records from the system and, at the same time, removing at least some expired ones of the records in the accessed linked list of records.</p>		the record to some external condition.		
	<p>identifying and removing at least some expired ones of the records from the linked list of records when the linked list is accessed</p>	<p>Both identification and removal of the automatically expired record(s) occurs during the same traversal of the linked list.</p>	<p>Bedrock believes that this term language is properly construed pursuant to 35 U.S.C. § 112(6).</p>	
	<p>identifying and removing at least some expired ones of the records from the linked list of records when the linked list is accessed</p>	<p>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 records.</p>	<p>Bedrock believes that this term language is properly construed pursuant to 35 U.S.C. § 112(6).</p>	
	<p>identifying and removing at least some expired ones of the records from the linked list of records when the linked list is accessed</p>	<p>[AGREED]</p>	<p>[AGREED]</p>	<p>No construction necessary.</p>
	<p>a hashing means to provide access to records stored in a memory of the system and using an external chaining</p>	<p>Indefinite</p>	<p>Function: The <u>recited function</u> is using hashing to provide access to records stored in a memory of the system and using an external chaining technique to store the records</p>	

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	<p>technique to store the records with same hash address, at least some of the records automatically expiring</p>		<p>with same hash address, at least some of the records automatically expiring.</p> <p>Structure: The <u>corresponding structure</u> 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 an external chaining hash table, and/or as described in col. 5, lines 16-41, or the equivalents thereof.</p>	
	<p>a record search means utilizing a search key to access a linked list of records having the</p>	<p>Indefinite</p>	<p>Function: The <u>recited function</u> is record searching utilizing a search key to access a linked list of records having the same hash address.</p>	

Disputed Claims	Disputed Claim Term or Phrase	Defendants' Proposed Construction	Bedrock's Proposed Construction	Court's Construction
	same hash address		<p>Structure: The <u>corresponding structure</u> 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.</p>	
	the record search means including a means for identifying and removing at least some expired ones of the records from the linked list of records	<p>Function: identifying and removing at least some [of the] expired ones of the records from the linked list [of records] when the linked list is accessed.</p>	<p>Function: record searching including identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed.</p> <p>Structure: (1) Portions of the</p>	

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	<p>when the linked list is accessed</p>	<p>For the construction of this function, see proposed constructions above, as further described in Joint Claim Construction Statement [Dkt. 251].</p> <p>Structure: Boxes 10 and 11 of Fig. 1, Boxes 38 and 42 of Fig. 3, Fig 4, pseudocode in the Search Procedure (cols. 11-14) and Remove Procedure (cols. 13-14), and corresponding portions of the specification.</p>	<p>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. (2) Executable software as described in Boxes 33-42 of FIG. 3, and/or as pseudo-code 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 34, or the equivalents thereof.</p>	
	<p>mea[n]s, utilizing the record search means, for inserting, retrieving, and deleting records from the system and, at the same time, removing at least some expired ones of the records in the</p>	<p>Function: utilizing the record search means, [accessing the linked list / inserting, retrieving, and deleting from the system] and, at the same time, removing at least some of the expired ones of the records in the linked list.</p>	<p>Function: utilizing the record search means, inserting, retrieving, and deleting records from the system and, at the same time, removing at least some expired ones of the records in the accessed linked list of records.</p> <p>Structure: (1) Portions of the</p>	

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	<p>accessed linked list of records.</p>	<p>"At the same time" means during the same traversal of the linked list as [accessing the linked list / inserting, retrieving, and deleting records from the system].</p> <p>For the construction of "removing ...", see proposed construction above, as further described in Joint Claim Construction Statement [Dkt. 251].</p> <p>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.</p> <p>Inserting, retrieving, and</p>	<p>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. (2) Executable software which provides the insert, retrieve, or delete record 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.</p>	

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<p>6. The information storage and retrieval system according to claim 5 further including means for dynamically determining maximum number for the record search means to remove in the accessed linked list of records.</p>	<p>dynamically determining maximum number for the record search means to remove in the accessed linked list of records</p>	<p>deleting are all required.</p> <p>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</p> <p>OR</p> <p>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.</p>	<p>Bedrock believes that this term language is properly construed pursuant to 35 U.S.C. § 112(6).</p>	
	<p>means for dynamically determining</p>	<p>Indefinite</p>	<p>Function: The recited function is dynamically determining maximum number of records</p>	

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	<p>maximum number for the record search means to remove when the linked list is accessed</p>		<p>for the record search means to remove in the accessed linked list of records.</p> <p>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</p>	

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			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 and retrieving information records using a hashing technique to provide access to the records and using an external chaining technique to store the records with same hash address, at least some of the records automatically expiring , the method comprising the steps of: accessing a linked list of records having same hash address,	external chaining	[AGREED]	[AGREED]	a technique for resolving hash collisions using a linked list(s)
	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.
	automatically expiring / expired	Becoming obsolete and no longer needed in the storage system by comparing some portion	After a limited period of time or after the occurrence of some event, becoming obsolete and therefore no longer needed or	

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<p>identifying at least some of the automatically expired ones of the records,</p> <p>removing at least some of the automatically expired records from the linked list when the linked list is accessed,</p> <p>and</p> <p>inserting, retrieving or deleting one of the records from the system following the step of removing.</p>		<p>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.</p>	<p>desired in the storage system / obsolete and therefore no longer needed or desired in the storage system.</p>	
	<p>identifying at least some of the automatically expired ones of the records,</p> <p>removing at least some of the automatically expired records from the linked list when the linked list is accessed.</p>	<p>Both identification and removal of the automatically expired record(s) occurs during the same traversal of the linked list.</p>	<p>No construction necessary.</p>	
	<p>removing at least some of the automatically expired records from the linked list when the linked list is accessed</p>	<p>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</p>	<p>No construction necessary; however, should the Court construe this term: "removing at least some of the automatically expiring records from the linked list when the linked list is accessed for a purpose other than garbage</p>	

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		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	<p>The elements of claim 7 must be executed in order.</p> <p>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.</p>	<p>No construction needed.</p> <p>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.</p>	
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	

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linked list is accessed.		<p>OR</p> <p>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.</p>	<p>OR</p> <p>In response to Defendants' proposed construction of "Prior . . . information system", after post-Markman discussions with the Defendants the following:</p> <p>For Claim 8, "the step of method claim 8 is performed before the removing step of claim 7, that is the object of determination."</p>	